

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
GREGORY ELEFTERAKIS, ROMAN POLLAK,  
ANTHONY BRIDDA, IME COMPANIONS LLC,  
CLIENT EXAM SERVICES LLC, and IME  
MANAGEMENT & CONSULTING LLC,

Defendants.  
-----X

Case No.: 1:22-cv-1032 (PKC) (JRC)

**SECOND SUPPLEMENTAL  
DECLARATION OF DANIELLA LEVI  
IN FURTHER SUPPORT OF  
PLAINTIFF'S MARCH 6, 2024  
MOTION FOR CONTEMPT**

I, Daniella Levi, Esq., pursuant to 28 U. S.C. § 1746, declare as follows:

1. I am the Chief Executive Officer of IME WatchDog, Inc. (hereinafter "Plaintiff") in the above-referenced case.

2. I respectfully submit this second supplemental declaration in further support of Plaintiff's March 6, 2024 motion to hold Defendants in contempt.

3. Before providing evidence of any additional misconduct by Defendants, I respectfully wish to address this Court's concern that Plaintiff provided evidence that it has previously submitted in support of its previous contempt motions and portrayed it as new evidence; this is not so.

4. Although the invoice from Subin Associates LLP ("Subin") was previously submitted in support of Plaintiff's prior contempt motions, it is being resubmitted along with new evidence that independently corroborates the contents of the Subin invoice, thereby eviscerating Defendant Safa Abdulrahman Gelardi's ("Safa") prior declaration that the Subin invoice was "falsified." See ECF Docket Entry [225](#) ¶ 3.

5. As what is now alarmingly par for the course, Safa has yet again perjured herself.

6. Plaintiff has therefore been forced to undertake the herculean and costly effort to issue approximately one hundred (100) subpoenas to obtain the actual evidence of violations of the March 27, 2023 expanded Preliminary Injunction (the “Injunction”), including independent medical examination (“IME”) reports that were not available at that time; there was thus newly submitted evidence that further bolsters the authenticity of the Subin invoice.

7. Therefore, the additional evidence Plaintiff submitted is new evidence.

8. On April 25, 2024, this Court issued an Order stating, in relevant part:

to the extent that Plaintiff seeks to base its contempt motion on any additional alleged misconduct, it shall do so by filing an affidavit that complies with Local Civil Rule 83.6 by 5/1/2024

See Text Only Order dated April 25, 2024 expanding preliminary injunction.

9. I respectfully incorporate by reference my first supplemental declaration and the entire contents therein. See ECF Docket Entry [317](#).

10. Below is a summary of additional instances of misconduct by the Defendants that Plaintiff has uncovered to date as Plaintiff continues to find additional evidence of contempt virtually every day, including on May 1, 2024 when Giant Partners Inc (“Giant Partners”) provided its response to Plaintiff’s subpoenas.

11. To preface same and the averments made in my first supplemental declaration, Plaintiff summarizes the evidence as follows.

12. Defendants have repeatedly, willfully, and contumaciously violated and sought to end-run around the Injunction by continuing to operate through agents, successors, alter egos, and proxies in violation of the March 10, 2023 temporary restraining Order (“TRO”) and the Injunction.

13. Defendants have done so with abandon for this Court’s Orders; initially, by forming Client Exam Services LLC (which this Court properly enjoined), and now through IME Legal Reps.

14. Indeed, Defendants continued to violate the TRO and the Injunction by setting up Eugene Liddie (“Liddie”) as the face of IME Legal Reps in April 2023 while Safa continued to work with Plaintiff’s customers which are on the Enjoined Customers List.

15. Both of these entities are alter egos and successors of IME Companions LLC (“Companions”), as is demonstrated below by the overwhelming evidence received from Giant Partners, the fact that each entity serves the same customers (all of which are on the Enjoined Customers List), utilizes the same agents to observe IMEs, employs the same marketing companies, operated by Defendants, and profits off of the same stolen trade secrets from Plaintiff.

16. Specifically, despite Safa’s and Liddie’s “convincing” testimony that Defendants had nothing to do with forming IME Legal Reps, the email exchanges between Giant Partners, Safa, and Liddie demonstrates that they both committed perjury. See ECF Docket Entries [319](#) and [319-1](#); see also additional email exchanges annexed hereto as **Exhibit “A.”**

17. To the contrary, the evidence demonstrates that Defendants formed and operated IME Legal Reps from its inception, and have only utilized Liddie – a full-time police officer who never sought leave from the NYPD to run this separate business with zero experience or credentials in the IME observer industry – as a straw man to hide Defendants’ involvement and circumvent the Injunction in complete disregard of this Court’s Orders.

18. Not only have Defendants operated and profited from IME Legal Reps from the get-go, they have been deeply entrenched in its marketing efforts and have continued to utilize the same stolen trade secrets to do so, causing further irreparable harm to the Plaintiff. See, e.g., **Exhibit “B.”**

19. This is despite the fact that Defendants were directed to “return to Plaintiff all originals and copies of documents, records, and information, whether in hard copy and/or computerized and/or other electronic media form, that contain Plaintiff’s trade secrets and confidential and proprietary information” by this Court on May 13, 2022 in the original preliminary injunction.

20. Further, the documents received in response to the Giant Partners subpoena establish that Defendants willfully violated the Injunction (including the prior preliminary injunctions) by directly contacting over two hundred (200) customers on the Enjoined Customers List. See copy of spreadsheet maintained by Defendants and their agents Liddie and Giant Partners consisting largely of Plaintiff’s 2017 customer list, documenting Defendants’ extensive efforts to contact Plaintiff’s customers, annexed hereto as **Exhibit “C” (filed under seal)**.

21. Moreover, a review of the IMEs conducted below further demonstrates that IME Legal Reps is an alter ego, successor, and proxy of Companions.

22. On March 10, 2023, Rohan Manragh (“Manragh”), a plaintiff in a personal injury case represented by Subin, a firm on the Enjoined Customer List, attended an IME at which he was accompanied by “IME Companion, Mr. Jeff Beiben.” **(Annexed hereto as Exhibit “D” is a copy of the IME report received in response to a subpoena served regarding Manragh’s lawsuit)**. It is worth noting that this IME appears on the IME Companions April 2023 invoice to Subin on the first page.

23. On March 27, 2023, Luis Savinon, a plaintiff in a personal injury case represented by Ginarte Gallardo Gonzalez Winograd L.L.P. (“Ginarte”), a firm on the Enjoined Customer List, attended an IME at which he was accompanied by “Sara Gonzalez, his interpreter from Joseph A Ginarte.” See NYSCEF Docket Entry [36](#) in Savinon v. Ismail, Index No.: 23552/2019E (Bronx County Supreme Court).



24. Notably, on March 14, 2023, just thirteen (13) days earlier, Miguel Ovalles Diaz (“Diaz”), a plaintiff in a personal injury case, who is also represented by Ginarte, attended an IME at which, ironically, he was “accompanied by Sara Gonzalez from Client Exam Services.” **(Annexed hereto as Exhibit “E” is a copy of the IME report we received in response to a subpoena served regarding Diaz’s lawsuit).** In addition, on April 12, 2023, Diaz had another IME at which he was “accompanied by Lizbeth Medina, who identified herself as his legal representative.” **(Annexed hereto as Exhibit “F” is a copy of the IME report we received in response to a subpoena served regarding Diaz’s lawsuit).**

25. On April 7, 2023, Allendy Nunez-Jimenez, a plaintiff in a personal injury case, who is represented by Subin, a firm on the Enjoined Customer List, attended an IME with Dr. Douglas Unis at which she was “accompanied by Christian Hogarth [“Hogarth”] of Client Exam Services”. **See copy of the IME report on the Jimenez lawsuit we received in response to a subpoena served regarding Miguel Ovalles Diaz’s lawsuit annexed hereto as Exhibit “G”); see also NYSCEF Docket Entry [1](#) in Jimenez v. Shalyn Realty Corp., Index No.: 507576/2022 (Kings County Supreme Court) (indicating Subin is counsel of record).**

26. This information was obtained from Rebore, Thorpe & Pisarello P.C., the defense firm on this case as a response to our subpoena. It is worth noting that this IME appears on the IME Companions April 2023 invoice to Subin on the first page. See ECF Docket Entry [220-3](#).

27. On April 12, 2023, Diaz, a plaintiff in a personal injury case who is represented by Ginarte, a firm on the Enjoined Customer List, attended an IME at which he was “accompanied by Lizbeth Medina, who identified herself as his legal representative”. **(Annexed hereto as Exhibit “H” is a copy of the IME report we received in response to a subpoena served regarding Diaz’s lawsuit).**

28. On April 13, 2023, Fausto Deleg, a plaintiff in a personal injury case who is represented by Ginarte, a firm on the Enjoined Customer List, attended an IME at which he was accompanied by “Tiffany Uribe, a representative of the Ginarte Law Firm.” **(Annexed hereto as Exhibit “I” is a copy of the IME report we received in response to a subpoena served regarding Fausto Deleg’s lawsuit).**

29. On April 14, 2023, Laura Burns, a plaintiff in a personal injury case, in which she is represented by Bergman, Bergman, Fields & Lamonsoff, a firm on the Enjoined Customer List, attended an IME at which she was “accompanied by Jeff Beiben from IME Companions.” See **NYSCEF Docket Entry [17](#) in Burns v. Reith, Index No.: 611497/2022 (Suffolk County Supreme Court).**

30. It is worth noting that Mr. Beiben has been present for almost every hearing in this case and has testified twice at these hearings.

31. In addition to being the brother-in-law to the Gelardi’s, Mr. Bieben is well aware of the facts and circumstances and has clearly and willfully acted in aiding IME Companions to not comply with the Injunction.

32. On April 19, 2023, Rafael Antonio Cuaxil, a plaintiff in a personal injury case, in which he is represented by Ginarte, a firm on the Enjoined Customer List, attended an IME at which he was accompanied by a “Legal Representative, F. Gutierrez”.

33. It is worth noting that non-party Mayra Gomez’s declaration and photo exhibits corroborates the IME Physician’s report and the presence of Fari Gutierrez at this IME. See ECF Docket Entry [212](#); see also **copy of the IME report we received in response to a subpoena served regarding Rafael Antonio Cuaxil’s lawsuit annexed hereto as Exhibit “J.”**

34. On April 20, 2023, Mauricio Aguilar Saldivar (“Saldivar”), a plaintiff in a personal injury case, in which he is represented by Ginarte, a firm on the Enjoined Customer List, attended an IME at which Assaf Abdelatif, an IME Companion, attended with the Plaintiff as his legal representative. **See response to subpoena from Freehill Hogan & Mahar LLP (“Freehill”), the defense firm in the foregoing action annexed hereto as Exhibit “K;” see also NYSCEF Docket Entry [1](#) in Saldivar v. Lee, Index No.: 520616/2018 (Kings County Supreme Court) (establishing Ginarte represents Saldivar).**

35. On May 1, 2023, Sean Burton, a plaintiff in a personal injury case, in which he is represented by Zemsky & Salomon P.C., a firm on the Enjoined Customer List, attended an IME at which “[h]e was accompanied by a representative from his attorney’s office, Mr. Christian Hogarth.” **See NYSCEF Docket Entry [35](#) in Burton v. Brown, Index No.: 524726/2020 (Kings County Supreme Court).** It is worth noting, that just ten (10) days later, May 11, 2023, “Christian, an IME Representative” accompanied the plaintiff to another IME. **See Id., NYSCEF Docket Entry [36](#).**

36. On May 4, 2023, Karla R. Wong (“Wong”), a plaintiff in a personal injury case, in which she is represented by Ginarte, a firm on the Enjoined Customer List, attended an IME at which Sara Gonzalez accompanied Wong. **(Annexed hereto as Exhibit “L” is a copy of the IME report we received in response to a subpoena served regarding Wong’s lawsuit).**

37. On May 18, 2023, Enildo H. Disla (“Disla”), a plaintiff in a personal injury case, in which he is represented by Ginarte, a firm on the Enjoined Customer List, attended an IME at which Lizbeth Medina attended with him. **(Annexed hereto as Exhibit “M” is a copy of the IME report we received in response to a subpoena served regarding Disla’s lawsuit) (“The Claimant was accompanied by a legal representative by the name of Ms. Medina”).**

38. On May 19, 2023, Arcenis Rosa-Mejia, a plaintiff in a personal injury case in which he is represented by Ginarte, a firm on the Enjoined Customer List, attended an IME, “claimant was accompanied by Lizbeth Medina from IME Legal Reps.” **(Annexed here to as Exhibit “N” is a copy of the IME report we received in response to a subpoena served regarding Rosa-Mejia’s lawsuit).**

39. On October 10, 2023, Salvador, a plaintiff in a personal injury case, in which he is represented by Ginarte, a firm on the Enjoined Customer List, attended another IME at which Hogarth attended with Salvador. **(Annexed hereto as Exhibit “O” is an email from a representative of Freehill in response to a subpoena served regarding Salvador’s lawsuit).**

40. On January 31, 2024, Salvador, who remained represented by Ginarte, attended another IME at which Hogarth from *IME Legal Reps* attended. **(Annexed hereto as Exhibit “P” is an email from a representative of Freehill in response to a subpoena served regarding Salvador’s lawsuit).**

41. Plaintiff was damaged by the Defendants’ continued contempt as follows.

42. For each IME completed, Plaintiff is entitled to damages for loss of goodwill and lost profits, the amount which it shall prove at the May 29, 2024 hearing, and which should be kept confidential and/or under seal. Also, this Court should issue a fine of \$5,000.00 per IME and each established violation of the TRO and/or the Injunction.

43. Moreover, Plaintiff is entitled to and seeks injunctive relief as follows:

(i) enjoining IME Legal Reps from serving customers on the Enjoined Customers List and from utilizing Plaintiff’s trade secrets;

(ii) return and/or destroy the stolen trade secrets through the use of an independent third-party court monitor to be paid for by the Defendants;


(iii) issuing a court-authorized notice to all of Plaintiff's customers and requiring the court-authorized notice to be prominently displayed on the IME Legal Reps' website and any other website associated with the Defendants and/or non-party Liddie;

(iv) an additional forensic examination of Defendants' and Liddie's electronic accounts and devices to determine all violations of the TRO and Injunction, at Defendants' cost due to their willful efforts to evade the TRO and Injunction; and

(v) Safa and Liddie should be held in contempt of court, and the Court should direct the U.S. Marshal to arrest Safa and Liddie due to their demonstrable perjury and willful and contumacious conduct in disobeying this Court's multiple Orders.<sup>1</sup>

44. Finally, Plaintiff is entitled to attorneys' fees and costs, which continue to accrue, and which Plaintiff will supplement upon an Order finding Defendants in contempt.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 3, 2024.

  
\_\_\_\_\_  
Daniella Levi (May 3, 2024 12:16 EDT)  
\_\_\_\_\_  
Daniella Levi, Esq.

---

<sup>1</sup> See Plaza Motors of Brooklyn v. Rivera, No. 1:19-cv-6336 (July 14, 2022 E.D.N.Y.) (LDH) (RLM), Text Only Order (“Defendant Rivera has failed to comply with this Courts ... order despite being given multiple chances to do so. The Court is convinced that arrest is the least possible power adequate to secure compliance”); CE Intl. Resources Holdings LLC v S.A. Mins., Ltd., 2013 U.S. Dist. LEXIS 21798 (S.D.N.Y. Jan. 24, 2013); Labarbera v. Gulgar Trucking, 2020 U.S. Dist. LEXIS 21810 (E.D.N.Y. Feb. 4, 2020).

# EXHIBIT A

## Subject: Re: imelegalreps



**Conor McDaniel** <conor@giantpartners.com>  
to Corey Weissman, Jeremy Koenig

Wed, Apr 12, 2023,

Received - thank you Corey.

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)



**GIANTPARTNERS**

On Tue, Apr 11, 2023 at 10:17AM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Conor,

Here are the credentials for the GoDaddy account for Safa at IME Legal Reps.

I just asked about the hosting and will let you know.

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



**GIANTPARTNERS**

**From:** [Safa Gelardi](#)  
**To:** [Estefania Sedano](#)  
**Cc:** [Conor McDaniel](#); [imelegalreps@gmail.com](mailto:imelegalreps@gmail.com); [Corey Weissman](#); [Scott Owen](#); [Steve Page](#)  
**Subject:** Re: GP - IME Legal Reps  
**Date:** Thursday, April 13, 2023 9:12:03 PM

---

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](http://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,



**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)



Dear -----, thank you for inquiring about our services,

I'd like to introduce you to IME Companions. IME Companions is an innovative company that ensures plaintiff attorneys have an independent record of what transpired during an IME visit. For over 5 years IME Companions has been there for law firms and their clients during their defense-ordered medical exams, IME Companions and its team of trained advocates provide attorneys an extension to reach across the nation to be at their client's defense-ordered exams when they cannot be. The role of each Companion is to be there every step of the way- from client preparation to being in the exam room with them and even in court. Law firms can trust that their client's exams will go as smoothly as possible, and will grant the best results. Our mission is to balance the scales of justice, **We are there to do what you would do if you were to attend the IME.** We are an Owner operated family-run business, establishing ourselves as the lead provider of advocates during IMEs, and we can ensure a successful and professional IME visit for your clients. IME Companions has very qualified Companions. Our reports are robust and timely, and we have a web portal that will enable your firm to not only access all historical reports done through us but to also seamlessly schedule future exams.

When you hire us, you can expect that we will conscientiously and diligently perform the following:

- Interview you to determine your needs for the exam.
- Call your client 24 hours before the IME to make sure he/she will be attending and provide directions, if necessary.
- Meet your client at the location of the IME.
- Take a high-resolution picture of the IME sign-in sheet which will then be converted to PDF format and forwarded to you.
- Observe the examination and take detailed notes of the intake questions and answers, the type of tests the doctor conducts, the plaintiff's performance during those tests, the length of the examination, and any other relevant points during the exam.
- We also ensure that your client does not permit the doctor to perform any unauthorized tests such as X-rays or MRIs.
- Provide a brief profile of the examining doctor.

- We will E-mail you, within 5 business days, a detailed report including all of our notes and observations.

Our job begins the moment an IME is assigned to our office. Along with the vendor's notice, BPs and any special requests from your office are sent to ours. An IME Companion is assigned to your client's IME. The IME Companion reviews the BPs and takes some notes. Your client is called the evening before the IME, where they are briefed over the phone on what to expect the next day during the IME visit, and the importance of being there on time, dressing comfortably, and not volunteering information. The IME Companion arrives the next day 15 minutes before the scheduled IME, where they will again brief your client, and answer any questions your client may have regarding the IME. A report is made and emailed to you thereafter.

**What makes us different is that we are owner-operated and family-run, you can access us at any time any day, and we take responsibility for your business because your business is our business. We take pride in our ability to advocate for plaintiffs during their IMEs while being extremely professional. Most IME Physicians know who IME Companions are, and they respect and understand what we do; as one of our important values is Professionalism.**

**We have Companions who speak: English, Spanish, Russian, Creole, French, Portuguese, Arabic, Urdu, and Hindi.**

Due to our proven success and proficiency, we work with the best. Our current clients include Subin Associates, Silberstein Awad Miklos, Zaremba Brown, Zemsky & Salomon, Bergman, Bergman & Lamonsoff, Alan Ripka & Associates, Raskin & Kremins, Gregory Spektor & Associates, and many more.

The IME Companion professional who attends the IME will also be available to submit an affidavit in support of your opposition to the defendant's motion for summary judgment and testify at trial.

First Hour - \$175

Additional Half Hour – \$45

Outside NYC and NYS is an extra fee

No extra fees apply for anywhere in Brooklyn, Bronx, Manhattan, and Queens.

No extra fees apply for bilingual Companions.

Looking forward to working with you.

Please feel free to reach out to me at any time; IME Companions is prepared and ready to protect your clients.

<https://www.prnewswire.com/news-releases/ime-companions-is-providing-legal-advocates-for-law-firms-to-help-veterans-in-the-3m-combat-arms-earplug-class-action-lawsuit-301490598.html>

Best Regards,

Safa Gelardi

Chief Executive Officer

Office: 833-463-7767

Direct: 718-749-4732

**P.O. BOX 90398**

**STATEN ISLAND NY 10309**

Email: [sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)

[www.imecompanions.com](http://www.imecompanions.com)

**From:** [Safa Gelardi](#)  
**To:** [Estefania Sedano](#)  
**Cc:** [Conor McDaniel](#); [imelegalreps@gmail.com](mailto:imelegalreps@gmail.com); [Corey Weissman](#); [Scott Owen](#); [Steve Page](#)  
**Subject:** Re: GP - IME Legal Reps  
**Date:** Thursday, April 13, 2023 9:12:03 PM

---

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](http://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)



**From:** [Safa Gelardi](#)  
**To:** [Estefania Sedano](#)  
**Cc:** [Conor McDaniel](#); [imelegalreps@gmail.com](mailto:imelegalreps@gmail.com); [Corey Weissman](#); [Scott Owen](#); [Steve Page](#)  
**Subject:** Re: GP - IME Legal Reps  
**Date:** Friday, April 14, 2023 12:03:17 PM

---

please deactivate [imecompanions.com](http://imecompanions.com). it is very important that the domain [imecompanions.com](http://imecompanions.com) be deactivated asap. [imelegalreps.com](http://imelegalreps.com) has to go up asap and when a client books we should get an email to [info@imelegalreps.com](mailto:info@imelegalreps.com). It is imperative this is done asap

On Fri, Apr 14, 2023 at 11:59 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Safa,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Thu, Apr 13, 2023 at 8:12 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](http://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)





Dear Mr. Scura, following up on our communication about using our services. I would love to secure your business, please let me know if you have any questions or concerns.

## Advantages of Using an IME Companions

- Well-trained professionals who are extremely effective at their job. They also appear at exams multiple times per day, so they get good at what they do.
- Prevents clients from answering inappropriate questions and being deposed.
- Prevents clients from undergoing unauthorized tests such as X-rays or MRIs.
- You'll get a written report of the start and end times of the physical, what happened at the physical exam, what was said at the physical, tests conducted, tests omitted, errors, and how the client performed.
- Companions can testify in court about what happened at the physical exam.
- Prevents clients from being approached by unscrupulous personal injury lawyers looking to grab your case.
- IME Companions can act as a translator.

We also covered audiology exams across the country for the 3M class action lawsuit.

<https://www.prnewswire.com/news-releases/ime-companions-is-providing-legal-advocates-for-law-firms-to-help-veterans-in-the-3m-combat-arms-earplug-class-action-lawsuit-301490598.html>

When you hire us, you can expect that we will conscientiously and diligently perform the following:

Interview you to determine your needs for the exam.

Call your client 24 hours before the IME to make sure he/she will be attending and provide directions, if necessary.

Meet your client at the location of the IME 15 min before their scheduled appointment

Observe the examination and take detailed notes of the intake questions and answers, the type of tests the doctor conducts, the plaintiff's performance during those tests, the length of the examination, and any other relevant points during the exam

We also ensure that your client does not permit the doctor to perform any unauthorized tests such as X-rays or MRI's.

Provide a brief profile of the examining doctor.

E-mail you, within 5 business days, a detailed report including all of our notes and observations.

We stay in full communication with you and your office, we notify you and your office of any long waits or anything out of the ordinary.

The IME Companion professional who attends the IME will also be available to submit an affidavit in support of your opposition to defendants' motion for summary judgment and testify at trial.

The rates are, 175 first hour and 45 each additional half hour.

Kind Regards,

Safa Gelardi  
Chief Executive Officer

Office: 833-463-7767  
Direct: 718-749-4732  
9207 245<sup>th</sup> St  
Floral Park, New York 11001  
Email: [sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)  
[www.imecompanions.com](http://www.imecompanions.com)

**From:** [IME Legal Reps](#)  
**To:** [Estefania Sedano](#)  
**Cc:** [Conor McDaniel](#); [Corey Weissman](#); [Scott Owen](#); [Steve Page](#)  
**Subject:** Re: GP - IME Legal Reps  
**Date:** Wednesday, April 19, 2023 12:25:27 PM

---

The phone number to my business is 800-409-9921, please update as well.

On Wed, Apr 19, 2023 at 12:02 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Eugene,

Nice to e-meet you!

I'm sorry to hear about Safa, but looking forward to working with you! I saw your missed call but my phone is currently updating the software.

If it works for you we can meet today, I'm pretty open after 1:30 pm PDT.

Regarding the Brand mockups, let me check in with the design team. I'm aware it's in QC, maybe they needed a couple of tweaks before sharing.

As for the website, will proceed to remove the video and double check there isn't anything related to IME Companions anymore.

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 19, 2023 at 9:23 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

Hello Everyone, This is Eugene Liddy, I am the owner of IME Legal Reps. Please remove the video about IME Companions and please get the new mock ups ready as soon as possible. we need this website up as IME Legal reps vision immediately. Please communicate only with me as Safa is no longer involved.

Eugene Liddy

On Fri, Apr 14, 2023 at 12:44 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Safa,

The team needs to get login approval. They have sent a Godaddy code to your email, could you please provide it?

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:15 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Safa,

Currently working on it! Let me check in with the team.

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:03 AM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:  
please deactivate [imecompanions.com](#). it is very important that the domain [imecompanions.com](#) be deactivated asap. [imelegalreps.com](#) has to go up asap and when a client books we should get an email to [info@imelegalreps.com](mailto:info@imelegalreps.com). It is imperative this is done asap

On Fri, Apr 14, 2023 at 11:59 AM Estefania Sedano  
<[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Safa,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Thu, Apr 13, 2023 at 8:12 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:  
Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano  
<[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:  
Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

**Estefania Sedano**

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel  
<[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:  
Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](http://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@glantpartners.com](mailto:conor@glantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)



**From:** [IME Legal Reps](#)  
**To:** [Estefania Sedano](#)  
**Cc:** [Conor McDaniel](#); [Corey Weissman](#); [Scott Owen](#); [Steve Page](#)  
**Subject:** Re: GP - IME Legal Reps  
**Date:** Wednesday, April 19, 2023 10:23:15 AM

---

Hello Everyone, This is Eugene Liddy, I am the owner of IME Legal Reps. Please remove the video about IME Companions and please get the new mock ups ready as soon as possible. we need this website up as IME Legal reps vision immediately. Please communicate only with me as Safa is no longer involved.

Eugene Liddy

On Fri, Apr 14, 2023 at 12:44 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:  
Hey Safa,

The team needs to get login approval. They have sent a Godaddy code to your email, could you please provide it?

Cheers,

**Estefania Sedano**

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:15 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:  
Hey Safa,

Currently working on it! Let me check in with the team.

Cheers,

**Estefania Sedano**

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:03 AM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:  
please deactivate [imecompanions.com](http://imecompanions.com). it is very important that the domain [imecompanions.com](http://imecompanions.com) be deactivated asap. [imelegalreps.com](http://imelegalreps.com) has to go up asap and when

a client books we should get an email to [info@imelegalreps.com](mailto:info@imelegalreps.com). It is imperative this is done asap

On Fri, Apr 14, 2023 at 11:59 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Safa,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Thu, Apr 13, 2023 at 8:12 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:



Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](https://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)



**From:** [Safa Gelardi](#)  
**To:** [Estefania Sedano](#)  
**Cc:** [Conor McDaniel](#); [imelegalreps@gmail.com](mailto:imelegalreps@gmail.com); [Corey Weissman](#); [Scott Owen](#); [Steve Page](#)  
**Subject:** Re: GP - IME Legal Reps  
**Date:** Friday, April 14, 2023 12:03:17 PM

---

please deactivate [imecompanions.com](http://imecompanions.com). it is very important that the domain [imecompanions.com](http://imecompanions.com) be deactivated asap. [imelegalreps.com](http://imelegalreps.com) has to go up asap and when a client books we should get an email to [info@imelegalreps.com](mailto:info@imelegalreps.com). It is imperative this is done asap

On Fri, Apr 14, 2023 at 11:59 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Safa,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Thu, Apr 13, 2023 at 8:12 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](http://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)





[Connect on LinkedIn](#)

On Mon, Apr 10, 2023 at 2:16 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Safa,

Here is the link to the new agreement, same details just new company, and us helping you build the new w

Please let me know if you have any questions:

**Eugene Liddy** (IMELegalReps@Gmail.com)

Eugene Liddy,

Click the link below to confirm your email address for your new PaymentGiant.com acc

<https://paymentgiant.com/index/confirm/key/5d305c3319670e4c6983114763847a49>

We are greatly looking forward to working with you again!

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

On Mon, Apr 10, 2023 at 12:59 PM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

[info@imelegalreps.com](mailto:info@imelegalreps.com)

1800-409-9921

205 Charleston Lane

Fate Texas 75189

Contact

Actions

SG

Safa Gelardi

Partner at JME Companions

safagelardi@gmail.com

Note

Email

Call

Task

Meeting

More

About this contact

Actions

Contact owner

Corey Weissman

First name

Safa

Last name

Gelardi

Company name

JME Companion

Website URL

<https://jmecompanions.com/>

Primary (Email)

Primary (Description)

LinkedIn URL

Job title

Partner

Email

safagelardi@gmail.com

Phone number

+1 (718) 749-4732

Extension

Mobile phone (number)

Status

Active

Overview

Activities

Search activities

Activity

Notes

Emails

Calls

Tasks

Meetings

Filter by: Filter activity (1/35) All users All teams

March 2024

✖ Email - GiantPartners Follow up- New Agreement From Corey Weissman

Pin Copy link Mar 20, 2024 09:32Z AM FCM

Corey Weissman

To: eugene@lmscomparisons.com, THE Legal Regis, Sofia General, Sofia General ➔

📧 Opened 4 Clicks 0

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.

I would like to schedule a call with you and Sofia and Jeremy and myself so we can discuss what you guys need and that way we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again soon.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 128

Text: (805) 625-6552

Email: corey@giantpartners.com

Calendar: Book meeting

LinkedIn: Connect

**February 2024**

**Email - ListGiant/GiantPartners- Follow up- Checking in from Corey Weissman:**

**Corey Weissman**  
to Sofia Gelsand · 4  
[Send](#)

Hi Sofia,

Happy New Year! I hope all is well with you, I wanted to check in and see if you are still working with Eugene at IME? How's everything going on your side?



We hope to still be a resource for you for any targeted data lists or digital marketing services.

Please let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners, Database Marketing Advisor  
Call: (805) 267-1575 ext 126  
Text: (805) 625-9332  
Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)  
Calendar: [Book meeting](#)  
LinkedIn: [Connect](#)

June 2023

✉ Email - Re: ZME Legal Reps - Website Review from Corey Weissman

 **Corey Weissman**  
no ZME Legal Reps, Scotty Galinski, Dan Hiller, Connor McCoskie, Estelinda Sedano · 

Hi Eugene!

I hope all is well with you and Safa, I wanted to check in as I have been unable to reach you over the phone. Is there a good day or time we can talk more about when you would like us to start the marketing campaign efforts?

Please let me know if you have any questions or concerns.

My direct line is: **805-871-0425**.

We look forward to hearing from you soon!

Thanks,



[Pin](#) [Copy link](#) Jun 23, 2023 at 1:37 PM EDT  
[Reply all](#) [Reply](#) [Forward](#) [Delete](#)

30

Companies (1)

+ Add

Primary

IME Companies  
imecompanies.com  

+1 (800) 409-9921

Last activity date: 03/20/2024 8:22 AM PDT

View associated companies

Deals (8)

+ Add

IME Companies: DG : 238416-6 : Recurring Business  
Amount: \$7,250.00  
Stage: **Won Opportunity** +  
Deal owner: Corey Weissman

IME Companies: DG : 238416-5 : Recurring Business  
Amount: \$7,250.00  
Stage: **Won Opportunity** +  
Deal owner: Corey Weissman

IME Companies: DG : 238416-4 : Recurring Business  
Amount: \$7,250.00  
Stage: **Won Opportunity** +  
Deal owner: Corey Weissman

IME Companies: DG : 238416-3 : Recurring Business  
Amount: \$7,250.00  
Stage: **Won Opportunity** +  
Deal owner: Corey Weissman

IME Companies: DG : 238416-2 : Recurring Business  
Amount: \$7,250.00  
Stage: **Won Opportunity** +  
Deal owner: Corey Weissman

Show more

View associated deals

Attachments **NEW**

+ Add

See the files attached to your activities or uploaded to this record.

Contacts (0)

+ Add

See the people associated with this record.

Corey

**COREY WEISSMAN**  
 corey@giantpartners.com  
 (805) 267-1575 ext 126  
[Schedule meeting](#)

...

[View thread \(9\)](#)

10 associations +

Email - Re: GiantPartners Follow up Marketing Efforts from Corey Weissman

Pin Copy link Jun 9, 2023 at 8:50 AM PDT



**Corey Weissman**  
 to Sofia Georghi, JME Legal Reps, JME Legal Reps -  
 Opens: 2 Closes: 0

Reply all Reply Forward Delete

Hi Eugene and Sofia,

I hope all is well with you both, I wanted to see if you could please update us regarding the marketing efforts for JME Legal Reps?

Our team is awaiting an update from you since we started updating your website back in April.

If either of you could please update us that would be greatly appreciated.

Let me know if you have any questions or concerns!

All my best,

Corey

**COREY WEISSMAN**  
 corey@giantpartners.com  
 (805) 267-1575 ext 126  
[Schedule meeting](#)

...

[View thread \(2\)](#)

7 associations +

Email - GiantPartners Follow up Marketing Efforts from Corey Weissman

Pin Copy link Jun 9, 2023 at 2:08 PM PDT



**Corey Weissman**  
 to Sofia Georghi, JME Legal Reps, 4536250@cc.hubspot.com -  
 Opens: 2 Closes: 0

Reply all Reply Forward Delete

Hi Eugene and Sofia

I hope all is well with you both, unfortunately I haven't been able to get a hold of either of you!

I wanted to check in regarding the court date in May that you mentioned you wanted to wait until that was over to begin the marketing efforts.

I have our team asking what is going on with this partnership.

Could either one of you please update me regarding when we can start marketing?

All my best,

Corey

**COREY WEISSMAN**  
 Giant Partners, Database Marketing Advisor  
 Call: (805) 267-1575 ext 126  
 Text: (805) 625-9332  
 Email: corey@giantpartners.com  
 Calendar Book meeting  
 LinkedIn Connect

**GIANTPARTNERS**

...

[View thread \(2\)](#)

7 associations +

Email - Re: GiantPartners Follow up- Update for IMELegalReps &amp; Eugene from Corey Weissman

Pin Copy link Jun 1, 2023 at 2:28 PM PDT



**Corey Weissman**  
 to Sofia Georghi, JME Legal Reps, JME Legal Reps -  
 Sent

Reply all Reply Forward Delete

Hi Sofia and Eugene,

I hope all is well with you, I wanted to check in and see if you have any updates regarding the marketing for JME Legal Reps?

We were waiting for your response on 5/15 regarding the court date you mentioned and we hope to hear from you soon!

Please let me know if there's a good day or time we can talk.

All my best,

Corey

**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist  
 corey@giantpartners.com  
 Office: (805) 267-1575 ext 126  
 Direct: (805) 871-9425

**GIANTPARTNERS**[Connect on LinkedIn](#)

...

[View thread \(2\)](#)

4 associations +

May 2023

Email - GiantPartners Follow up- Update for IMELegalReps &amp; Eugene from Corey Weissman

Pin Copy link May 30, 2023 at 2:13 PM PDT



**Corey Weissman**  
 to Sofia Georghi -  
 Opens: 1 Closes: 0

Reply Forward Delete

Hi Sofia,

I hope all is well with you, I wanted to check in and let you know we have been unsuccessful in reaching Eugene and we would like to know what's going on with IMELegalReps.

Can we start marketing? Can you have Eugene call us?

He hasn't picked up his phone and won't respond via email.

Please let me know ASAP

Thanks,

Corey

**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist

2023-04-25 10:40 AM

Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



**GIANTPARTNERS**  
America's #1 Data Driven Marketing Agency

[Connect on LinkedIn](#)

...

[View thread \(2\)](#)

[4 associations](#)

**Email - GiantPartners Follow up- Partnership Update** from Corey Weissman

[Pin](#) [Copy link](#) May 19, 2023 at 11:58 AM PDT

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)



**Corey Weissman**  
to Sofia Gelardi, IME Legal Rept. <

Opens: 3 Clicks: 0

Hi Sofia and Eugene,

I hope all is well with you, unfortunately I have not been able to get a hold of Eugene and the number you gave me Sofia the voicemail isn't set up so I cannot leave a message.

I have our team asking for an update regarding the marketing for IME Legal Rept as you mentioned you would have an update for us after 5/15 sometime to let us know when we can start the marketing campaign.

Do you have any updates for us or can we schedule a time to discuss any updates?

Let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



**GIANTPARTNERS**  
America's #1 Data Driven Marketing Agency

[Connect on LinkedIn](#)

...

[7 associations](#)

April 2023

**Email - Re: 025385** from Conor McDaniel

[Pin](#) [Copy link](#) Apr 25, 2023 at 8:57 AM PDT

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)



**Conor McDaniel**  
to Sofia Gelardi, IME Legal Rept, Estefania Sedano <

Opens: 3 Clicks: 0

Hey Sofia - can you clear your cache and check on your end?

We've removed the hosting IP from the DNS records.

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



**GIANTPARTNERS**  
America's #1 Data Driven Marketing Agency

[Connect on LinkedIn](#)

...

[View thread \(2\)](#)

[4 associations](#)

**Email - Re: 025385** from Conor McDaniel

[Pin](#) [Copy link](#) Apr 25, 2023 at 8:42 AM PDT

[Reply](#) [Forward](#) [Delete](#)



**Conor McDaniel**  
to Sofia Gelardi <

Opens: 1 Clicks: 0

We are in - thank you

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



**GIANTPARTNERS**  
America's #1 Data Driven Marketing Agency

[Connect on LinkedIn](#)

...

[View thread \(2\)](#)

[4 associations](#)

**Email - Re: 025385** from Estefania Sedano

[Pin](#) [Copy link](#) Apr 25, 2023 at 8:41 AM PDT

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)



**Estefania Sedano**  
to Sofia Gelardi, Corey Weissman <

Opens: 3 Clicks: 0

Thank you!

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext 150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Tue, Apr 25, 2023 at 10:40 AM Sofia Gelardi <[safogelardi@gmail.com](mailto:safogelardi@gmail.com)> wrote:

...

[4 associations](#)

**Email - IME Legal Rept - Updates** from Estefania Sedano

[Pin](#) [Copy link](#) Apr 26, 2023 at 12:13 PM PDT

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)



**Estefania Sedano**  
to Sofia Gelardi, Conor McDaniel, Corey Weissman, Manuel Cabrera <

Opens: 7 Clicks: 0

Hey Sofia,

Hope all is well!

I wanted to check in and send you an update on the work in progress - see below.

**Branding**

- Currently, the logo and colors mockups are in Quality Control, once we have approval from Scott I will be sending these



**Website updates**

- On Friday we moved the website development to the new domain: <https://imelegalreps.com/> and while we get the new branding approved and ready, we have removed any IME Companion logo or wording in the website.

**New Social & Paid Accounts**

- In order to set up the new Social Media and Paid accounts (such as Google Ads and LinkedIn), there are two ways to do it:
  - You can share the login information of the email you want to register all accounts.
  - Or we can schedule a meeting and do it together.

For the meeting, we can do:

**Wednesday** at 10:00 am or 1:00 pm - 3:30 pm PDT

**Thursday** at 9:00 am - 1:00 pm PDT

Let me know what works for you!

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

9 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 9:44 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Connor McDonald, imelegalreps@gmail.com, Corey Williamson, Scott Owen, Steve Page, +  
 1 Opens 24 Clicks 0

Hey Sofia,

The team needs to get login approval. They have sent a Godaddy code to your email, could you please provide it?

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 9:15 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Connor McDonald, imelegalreps@gmail.com, Corey Williamson, Scott Owen, Steve Page, +  
 1 Opens 19 Clicks 0

Hey Sofia,

Currently working on it! Let me check in with the team.

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 8:59 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Connor McDonald, imelegalreps@gmail.com, Corey Williamson, Scott Owen, Steve Page, +  
 1 Opens 13 Clicks 0

Good morning Sofia,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 13, 2023 at 2:43 PM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Connor McDonald, Sofia Gelardi, imelegalreps@gmail.com, Corey Williamson, Scott Owen, Steve Page, +  
 1 Opens 18 Clicks 0

Hi Sofia,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Connor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - GP - IME Legal Reps from Connor McDonald** Pin Copy link Apr 13, 2023 at 10:55 AM PDT  
Reply all Reply Forward Delete

**Connor McDonald**  
to Sofia Gelardi, imelegalreps@gmail.com, Corey Williamson, Estefania Sedano, Scott Owen, Steve Page, +  
 1 Opens 44 Clicks 0



Hey Sofia,

I hope all has been well! It's great to have you back on board!

I want to introduce you to your Account Manager, Ekaterina Sedano! You're in excellent hands with Ekaterina.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the DME Companions website over to the [linklegalregs.com](https://linklegalregs.com) domain and rebrand for DME Legal Regs.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For DME Legal Regs, can we use the same colors as DME Companions?

Thank you, Sofia!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



View thread (11)

12 associations

✉ Email - GiantPartners- Meeting Link from Corey Weissman

Pin Copy link Aug 30, 2022 at 11:02 AM PDT

**Corey Weissman**

To: Sofia Sedano

Re: Sofia Sedano

Hi Sofia,

Here is the link to the meeting just in case:

[meet.google.com/za7-tqgr-rvaw](https://meet.google.com/za7-tqgr-rvaw) content\_copy

Join by phone  
(US) +1 662-434-4834 PIN: 485 574 3458

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-9425



[Connect on LinkedIn](#)

5 associations

October 2022

✉ Email - Re: Subdomain for DME from Tiffany Lazlo

Pin Copy link Oct 12, 2022 at 12:13 PM PDT

**Tiffany Lazlo**

To: Sofia Sedano, Steve Page, Corey Weissman

Hi Sofia,

A code was sent to your email from Meta we need that as soon as you can send it over.

Thank you.

**Tiffany Lazlo**  
Giant Partners  
Account Manager  
Office: (805) 267-1575 x 160  
Text: (805) 828-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

10 associations

✉ Email - Re: Subdomain for DME from Tiffany Lazlo

Pin Copy link Oct 12, 2022 at 10:06 AM PDT

**Tiffany Lazlo**

To: Sofia Sedano, Steve Page, Lumina Support, Conor McDaniel, Corey Weissman

Hi Sofia,

Regarding Vera's email please let us know if the credentials listed below are correct as we were having issues accessing the domain.

- Hosting/Domain Service Name (ex. GoDaddy)
- Username: [info@linklegalregs.com](mailto:info@linklegalregs.com)
- Password: Pupa207H

Best,

**Tiffany Lazlo**  
Giant Partners  
Account Manager  
Office: (805) 267-1575 x 160  
Text: (805) 828-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

10 associations

✉ Email - Re: Subdomain for DME from Lumina Support

Pin Copy link Oct 12, 2022 at 9:54 AM PDT

**Lumina Support**

To: Sofia Sedano, Tiffany Lazlo, Steve Page, Conor McDaniel, Corey Weissman

Hi Tiffany and Sofia,

These appear to be the credentials for the WP backend.

Sofa, the team will need credentials to the domain registrar which from our records looks to be GoDaddy.com

Hope this helps.

**Vera Khodasevich**  
Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010



...

[View thread \(8\)](#)

10 associations

Re: Email - Re: Subdomain for IME from Tiffany Lazlo

Pin Copy link Oct 17, 2022 at 9:40 AM PDT



Tiffany Lazlo  
To: Sofia Gerasi, Lumina Support, Steve Page, Connor McDaniel, Corey Williamson

Reply all Reply Forward Delete

Hi Sofia,

Hope you had a great weekend.

Thank you so much for the password updates, I'll send this over to the team and let you know if we have any questions.

Best,

Tiffany Lazlo

Giant Partners

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



GIANTPARTNERS

[Connect on LinkedIn](#)

...

[View thread \(8\)](#)

10 associations

Re: Email - Re: Subdomain for IME from Tiffany Lazlo

Pin Copy link Oct 18, 2022 at 9:27 AM PDT



Tiffany Lazlo  
To: Sofia Gerasi, Lumina Support, Steve Page, Yenu Liem, Corey McDaniel, Corey Williamson

Reply all Reply Forward Delete

Hi Vera and Sofia,

Happy Friday and thank you for the updates.

Our team is waiting on that information so as soon as we hear back from you we can move forward and will let you know if we have any other questions.

Have a wonderful weekend.

Best,

Tiffany Lazlo

Giant Partners

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



GIANTPARTNERS

[Connect on LinkedIn](#)

...

[View thread \(8\)](#)

10 associations

Re: Email - Re: Subdomain for IME from Lumina Support

Pin Copy link Oct 18, 2022 at 9:29 AM PDT



Lumina Support  
To: Steve Page, Sofia Gerasi, Yenu Liem, Tiffany Lazlo, Connor McDaniel

Reply all Reply Forward Delete

Hi Steve,

Thanks for sending this update!

This looks like an adjustment that needs to be made on the domain level. This is separate from the server and, if IME approves, full access can be granted to the domain registrar as this is their own unique account.

The credentials that we have for IME's domain registrar no longer work, I imagine the password may have been changed some time ago.

@Sofia Gerasi should be able to provide these credentials.

Please let us know if you need any further assistance.

Best,

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway #1018

New York, NY 10010

332-444-3838

[lumina.nyc](http://lumina.nyc)



GIANTPARTNERS

[Connect on LinkedIn](#)

...

[View thread \(8\)](#)

10 associations

Re: Email - Subdomain for IME from Steve Page

Pin Copy link Oct 13, 2022 at 1:28 PM PDT



Steve Page  
To: Tiffany Lazlo, Sofia Gerasi, Lumina Support, Connor McDaniel

Reply all Reply Forward Delete

Open: 50 Click: 0

Hey Guys,

Our mistake. We changed the subdomain.

Please use this information below

Type: CNAME

Name: go

Value: [333649876316437a0d6dfo40c07oc8d.unbouncepages.com](https://333649876316437a0d6dfo40c07oc8d.unbouncepages.com)

TTL: 1 hour

Let us know if you have questions.

STEVEN PAGE

Giant Partners  
VP of Digital Strategy  
Office: (805) 367-1575 x148  
Text: (805) 666-1790

**GIANTPARTNERS**

Connect on LinkedIn

View thread (8)

10 associations

September 2022

Email - Re: List of counties in and around Atlanta Georgia from Corey Weissman

Pin Copy link Sep 30, 2022 at 3:08 PM PST



**Corey Weissman**  
VP of Digital Strategy, Giant Partners  
Open: 0 Close: 0

Reply all Reply Forward Delete

Hi Yusef and Sofia,

Thank you for sending over the various geographies you want to target.

Are there any others or is this all of it including the other emails?

Please let me know.

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (805) 367-1575 ext 126  
Direct: (805) 671-0421



**GIANTPARTNERS**

Connect on LinkedIn

View thread (4)

5 associations

Email - GP - CRM User from Conor McDaniel

Pin Copy link Sep 30, 2022 at 9:10 AM PST



**Conor McDaniel**  
To Sofia Gotsis, Tiffany Luzzo, Corey Weissman  
Open: 4 Close: 0

Reply all Reply Forward Delete

Hey Sofia,

I hope all is well.

Can you provide me with the name of the CRM you are using as well as the login credentials?

With Tiffany being on holiday, you can direct any questions to me for the following week. Thank you!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
conor@giantpartners.com  
(805) 367-1575 x151  
Connect on LinkedIn



**GIANTPARTNERS**

Connect on LinkedIn

7 associations

Email - Re: IHE Follow Up from Conor McDaniel

Pin Copy link Sep 30, 2022 at 8:19 AM PST



**Conor McDaniel**  
To Lumina Support, Tiffany Luzzo, Sofia Gotsis, Jimmy Page  
Sent

Reply all Reply Forward Delete

Hey Vera,

No worries at all.

When we have fully built the new website, we will send over instructions for you to host it.

Thank you, Vera!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
conor@giantpartners.com  
(805) 367-1575 x151  
Connect on LinkedIn



**GIANTPARTNERS**

Connect on LinkedIn

On Fri, Sep 30, 2022 at 7:42 AM Lumina Support <support@lumina.nyc> wrote:

Hi Tiffany,

Sorry for the delayed reply here. I didn't realize you were looking for access to the server, the credentials that were shared were to the site's WordPress backend.

We won't be able to grant direct access to the server as it is shared with other client sites, but can certainly discuss with the team how to get the things done that you need done.

So, could you please elaborate on your exact needs for the site?

Thanks,

**Vera Khodasevich**

Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010  
212.444.2458  
lumina.nyc



On Tue, Sep 27, 2022 at 7:53 PM Tiffany Luzzo <tiffany@giantpartners.com> wrote:

Our website developer is still having a hard time logging into the website hosting. Please use the information below and let us know if there is another login that we can use.

## Login

Sign in to your account to continue.

Login Details incorrect. Please try again.

Email Address

name@example.com

Password

Forgot Password?

Password

Login

☐ Remember Me

• Pub: 8N0JwZwJF2wJ8R  
• Ufr: ajadmin@giantpartners.com  
• Hosting/Control Service Name  
• Username: tiff@luminacompanions.com  
• Password: Pasa0027

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 5:55 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Thank you so much!

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 11:40 AM Lumina Support <support@luminadnyc> wrote:  
Thanks Tiffany, hope you had a great weekend as well.

Just created a user for that email, temporary password:  
• 03Uthwshgpx7HqW0caPhod

Just FYI for future needs, @Sofia (Saland) you're also able to create users on the site's backend via Users > Add New ( screenshot)

Hope this helps!

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway #1015  
New York, NY 10010  
212.444.2658  
luminadnyc



On Mon, Sep 26, 2022 at 2:26 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Hi Team,

Thank you so much, and I hope you had a great weekend.

Please let us know if you can add our [ajadmin@giantpartners.com](mailto:ajadmin@giantpartners.com) email to the website so that our team members can have access as well.

Best Regards,

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 8:24 AM Lumina Support <support@luminadnyc> wrote:  
Hi Tiffany,

We just created a new user for you on the website, you should be getting an email from the site about this as well.

Just in case, I'm also posting credentials here:

[https://luminacompanions.com/admin\\_login](https://luminacompanions.com/admin_login)

User: your email

Temporary Password: 0jxNehUvFmb7SRdxuX6

Note: the password should be updated once you've logged into the backend.

Let us know if this all suffices or if you're in need of any further access or assistance.

Best,

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010  
312.444.2658  
[lumina.nyc](http://lumina.nyc)



On Fri, Sep 23, 2022 at 2:29 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa and Lumina Support,

Thank you all and happy Friday.

We are looking to access the website on our end so that we can make some edits. Please let us know what you need from our team to get this started.

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
**Giant Partners**  
Account Manager  
Office: (805) 287-1575 x 160  
Text: (805) 826-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Fri, Sep 23, 2022 at 9:37 AM Safa Gerardi <[safagerardi@gmail.com](mailto:safagerardi@gmail.com)> wrote:  
Dear Tiffany, this is the Lumina Support email. they are very good at responding. If they please let me know and I will give them a call.

Please meet Tiffany from my marketing team, please give them any access they need for the website.

Safa Gerardi

On Thu, Sep 22, 2022 at 7:59 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

The hosting / domain credentials did not work for the Lumina hosting. Is there an email to a representative that you were in contact with that we can reach out to?

- <https://www.luminahosting.com/>
- Hosting platform: Hosting/Domain Service Name (ex. GoDaddy)
- Username: [info@imecompanions.com](mailto:info@imecompanions.com)
- Password: Pupa0507!

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
**Giant Partners**  
Account Manager  
Office: (805) 287-1575 x 160  
Text: (805) 826-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 4:10 PM Safa Gerardi <[safagerardi@gmail.com](mailto:safagerardi@gmail.com)> wrote:  
Yes I'd like to meet before your vacation. Any day before the 28th is good for me. And we can keep the logo.

On Thu, Sep 22, 2022 at 7:20 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Thank you for the update.

We will work with what we have and see what we can do. Also just to confirm for the team would you like us to stick with the current logo and branding as we are staying with the IMC Companions name?



If you want us to do some variations for this current logo please let us know. Also please let me know what day works best for you this coming week to set up a short 30 min meeting. I will be out of town from the 30th-Oct 7th so just a week but I'd like to meet before I head out so we can go over everything.

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
**Giant Partners**  
Account Manager  
Office: (805) 287-1575 x 160  
Text: (805) 826-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 3:32 PM Safa Gerardi <[safagerardi@gmail.com](mailto:safagerardi@gmail.com)> wrote:  
<https://youtu.be/vb8Qqg-wmoQ>

On Thu, Sep 22, 2022 at 6:29 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Thank you for the information.

I'll have the team look into that and let you know if we have any questions. Also regarding the video from the website our team wanted to know if you had that video without music so that we can trim and splice it into smaller videos for new content.

If you are able to get that please add it to the google drive folder and let me know as that would be greatly appreciated.

Best,

**Tiffany Laszlo**  
**Giant Partners**  
Account Manager  
Office: (805) 287-1575 x 160  
Text: (805) 826-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 1:52 PM Safa Gerardi <[safagerardi@gmail.com](mailto:safagerardi@gmail.com)> wrote:  
Hi Tiffany, I believe it's word press and the web developer is hosting it. It's Lumina their phone number is 2124442658

On Thu, Sep 22, 2022 at 12:12 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Hope your week is going well.

Our team wanted to know if you knew what hosting platform the current website was built on. We have tried the credentials from the document on a few different hosting platforms but they don't seem to be working so you think you could as the original developers that were working on the website?

Hosting platform: Hosting/Domain Service Name (ex. GoDaddy)

Username: Info@imecompanion.com

Password: Pupa0507!

Looking forward to hearing from you soon!

Best,

**Tiffany Lazzio**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

On Fri, Sep 16, 2022 at 12:47 PM Tiffany Lazzio <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Sofia,

Hope this email finds you well.

Our team also wanted to know if we have your approval to use the recommended website template below. This will be the layout for the wilderness civil site that we'll be working on for you.

- <https://www.elegantthemes.com/examples/legal-shield/>

Looking forward to hearing your thoughts.

Best,

**Tiffany Lazzio**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

On Fri, Sep 16, 2022 at 12:38 PM Tiffany Lazzio <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Sofia,

Happy Friday, how your week is going well.

Our team wanted to get your confirmation on which branding and logo we should use/create for the website and ad content. Should we use IME or DME Companions?

We also wanted to confirm the pricing on some of the services and the offers that we went over such as the \$175 per hour and the \$99 an hour for a basic report and if our team can use those as a specific call to action on ad creatives.

Also, please add any branding and marketing materials to the [Marketing Collateral](#) Google drive folder. Our team was asking if you had the raw video file for IME, the one on the website. We'd like to work with that content to make other ad variations.

For all the account access, please let me know a good time to set up a quick phone call to go over adding GP to the accounts. That way we don't run into any issues logging in with the provided credentials.

Looking forward to hearing from you soon.

Best,

**Tiffany Lazzio**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

8 associations

✉ Email - Re: Zip codes for Harris county from Corey Weissman

Pin Copy link Sep 21, 2022 at 12:48 PM PDT

**Corey Weissman**

to Sofia Gelardi

1 Open 0 Click 0

Hi Sofia,

I received those what about Georgia, New York, New Jersey and Pennsylvania?

We would want to submit all the geography at once if you can send those as well.

Please let me know.

Corey

**COREY WEISSMAN**

**Giant Partners**

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

View thread (8)

4 associations

✉ Email - Re: Zip codes for Harris county from Sofia Gelardi

Pin Copy link Sep 21, 2022 at 12:43 PM PDT

**Sofia Gelardi**

to Corey Weissman

Hi Corey, I sent you the counties and the zip codes in each county for Texas and Miami Florida.

View thread (8)

4 associations

✉ Email - Re: Zip codes for Harris county from Corey Weissman

Pin Copy link Sep 21, 2022 at 10:19 PM PDT

**Corey Weissman**

to Sofia Gelardi

1 Open 0 Click 0

Hi Sofia,

Thank you for starting to send over the geography, I will wait until you send the geography for each state, so it looks like you're doing just zip codes? In other states you can also target counties, zip radius or the full state. Or you can just supply zip codes in each state that is fine too.

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania



- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta, Georgia
- Florida, Orlando to Miami 100-mile radius

This is what you sent previously and based on the zip codes so far we have:

TX, Harris county zip codes, Fort Bend, and Galveston zip codes.

FL- Miami Dade zip codes.

Let me know if you have any questions or need anything else.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

...

[View thread \(3\)](#)

4 associations

Email - GiantPartners- Geography Request for the Data for Marketing Efforts from Corey Weissman

[Pin](#) [Copy link](#) Sep 22, 2022 at 2:23 PM PDT



**Corey Weissman**  
to Sofia Gaidis

Open: 1 Closed: 0

Hi Sofia,

I hope all is well with you, I know you have been very busy however I would like to try and get the data submitted this week if possible.

The only hold up is the geography, we need to know which areas you are willing to receive leads from based on zip codes, zip radius, county/ metro area, cities, states or nationwide.

This is what we have currently:

Previous Geography provided by SME:

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania
- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta, Georgia
- Florida, Orlando to Miami 100-mile radius

If you can please re-send this but confirm for each area what cities, counties, zip codes, zip radius, metro areas or full states you want to target?

For example:

1. Texas- Dallas and Harris County only
2. New York - Tri-State Area- Cities - New York, Long Island, etc.
3. New Jersey- Target Zip codes - xxxxx, xxxxx.
4. Georgia- Target Atlanta Metro Area.
5. Florida- Do a 100 mile zip radius from 32501- 100miles.

Please let me know if there are any questions or concerns as I recall you were going to send this to us last week on Friday.

We are greatly looking forward to receiving this and I believe Tiffany is trying to get a call scheduled with you ASAP as well.

Let me know your thoughts;

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

...

4 associations

Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 26, 2022 at 3:53 PM PDT



**Corey Weissman**  
to Sofia Gaidis

Open: 1 Closed: 0

Hi Sofia,

I hope you had a great weekend! I wanted to check in and see if you and your husband are able to get me the geography this week for where you want to target in each state?

We are awaiting your response and hope to hear from you this week so we can get this data pulled.

Let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

...

[View thread \(3\)](#)

4 associations

Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 26, 2022 at 3:53 PM PDT



**Corey Weissman**  
to Sofia Gaidis

Open: 1 Closed: 0

Hi Sofia,

I hope all is well with you and your husband!

I wanted to check in and see if you have the geography ready for us for the data?

Please let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

4 associations

✉ Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 21, 2022 at 9:20 AM PDT



**Corey Weissman**  
To: Sofia Galarza

1 Open 1 Closed 0

Hi Sofia,

I hope all is well. I wanted to follow up and see if you have the geography ready for us?

Let me know if you have any questions!

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

4 associations

✉ Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 30, 2022 at 9:49 AM PDT



**Corey Weissman**  
To: Sofia Galarza

1 Open 2 Closed 0

Hi Sofia,

So I just met with Jeremy and our team and all we need is that geography from you so if you can send it today I can get the data going today, there is no need to rip on a call again for the data since we have all the details from you unless there are any changes?

**PERSONAS: A (B2B) - Personal Injury Attorney Firms, B (B2B) - Workers Compensation Attorneys Primary Contacts: Attorneys, Office Managers, Clerks (IME, Calendar), Paralegals Decision Makers: Owners, Partners, Principal Officers Name: "Super Lawyers" - Lawyers that go to trial/court (NY State Trial Lawyer's Association), when lawyers settle out of court they do not value IME Compensations report/benefit, work with plaintiffs.**

Please send the geography for each state at your earliest convenience.

Please let me know if you have any questions or concerns.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

4 associations

✉ Email - GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 30, 2022 at 9:27 AM PDT



**Corey Weissman**  
To: Sofia Galarza

1 Open 3 Closed 0

Hi Sofia,

So here is what I have from our conversation regarding geography:

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania
- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta Georgia
- Florida, Orlando to Miami 100-mile radius

If you can please re-send this but confirm for each area what cities, counties, zip codes, zip radius or full state you want to target? For example:

1. Texas- Dallas and Harris County only
2. New York - Tri-State Area- Cities - New York, Long Island, etc.
3. New Jersey- Target Zip codes - xxxxx, xxxxx;
4. Georgia- Target Atlanta Metro Area.
5. Florida- Do a 100 mile zip radius from .33551- 100miles.

If you can please have this for our call tomorrow morning that would be greatly appreciated.

Please let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

4 associations

✉ Email - GiantPartners- Data Overview Call from Corey Weissman

[Pin](#) [Copy link](#) Sep 30, 2022 at 9:02 AM PDT



Corey Weissman  
To: Sofia General -  
Open: 1 Click: 0

Hi Sofia,

I hope you're doing well, I am on the call right now for our 9 am PST/12 pm EST call to go over the data.

Do we need to reschedule or does this work for you still?

Here is the meeting link just in case:


[meet.google.com/qzv-vllg-nyt](https://meet.google.com/qzv-vllg-nyt)

Let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0423



[Connect on LinkedIn](#)

4 associations

August 2022

Email - Fwd: GP - Welcome to Giant Partners! from Corey Weissman  
Pin Copy link Aug 29, 2022 at 11:40 AM PDT  
Reply all Reply Forward Delete

Corey Weissman  
To: Sofia General, Tiffany Luzzo, Conor McDaniel -  
Open: 62 Click: 0

Hi Sofia,

I hope all is well, and it was a pleasure speaking with you briefly today.

I wanted to forward you the email Tiffany sent just in case you didn't receive it.

If you can fill out the onboarding information and provide any emails of other members on your team for access to the google drive as soon as possible that would be great so we can schedule the kick-off call.

Please let us know what days/times work best for you and your team for the kick-off call once you have completed the documents sent by Tiffany.


Also if you could, please "Reply All" to Tiffany's email so everyone gets your responses.

Please let us know if you have any questions or concerns.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0423



[Connect on LinkedIn](#)

5 associations

View thread (2)

Email - GP - Welcome to Giant Partners! from Conor McDaniel  
Pin Copy link Aug 26, 2022 at 1:07 PM PDT  
Reply all Reply Forward Delete

Conor McDaniel  
To: Sofia General, Tiffany Luzzo, Corey Weissman -  
Open: 62 Click: 0

Hey Sofia,


My name is Conor McDaniel, and I'm the Director of Operations here at Giant Partners. It's a pleasure to e-meet you!

Your Account Manager, Tiffany Luzzo, will be reaching out to you today to kick off our partnership with next steps.

You are in great hands with Tiffany! My "door" is always open should you have any questions throughout the process. Feel free to reach out to me.

Cheers,

**CONOR MCDANIEL**  
Giant Partners  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



7 associations

View thread (2)

Email - Re: GiantPartners/ListGiant Follow up- Partnership Link Inside from Corey Weissman  
Pin Copy link Aug 26, 2022 at 7:55 AM PDT  
Reply Forward Delete

Corey Weissman  
To: Sofia General -  
Open: 1 Click: 0

Hi Sofia,

That would not be us, as we haven't sent you the onboarding documents and kick off call details which you will be receiving today from us.


Our Digital team will be reaching out to you today and I will be CC'd on the email as well.

Please let me know if you have any other questions or concerns.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0423



[Connect on LinkedIn](#)



✉ Email - Re: Invitation: GiantPartners & IMECompanion - Strategy Proposal @ Tue Aug 23, 2022 2pm - 3pm (EDT) (sfofelard@gmail.com) from Corey Weissman Pin Copy link: Aug 23, 2022 at 10:27 AM PST  
 Reply Forward Delete

Corey Weissman  
 to sfofelard@gmail.com  
 Open: 0 Close: 0


Hi Safa,

No problem at all, just re-sent the invite for tomorrow at the same time!

We are very excited to present to you and build a long-term mutually beneficial relationship!

All my best,

Corey  
**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
 Office: (805) 267-1375 ext 126  
 Direct: (805) 871-0423

  
 Connect on LinkedIn

On Tue, Aug 23, 2022 at 9:04 AM Safa Gelardi <[sfofelard@gmail.com](mailto:sfofelard@gmail.com)> wrote:  
 Hi Corey,  
 Today's zoom will not work for me. Can we do tomorrow same time

On Fri, Aug 19, 2022 at 1:35 PM <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

[Join with Google Meet](#)

**Meeting link**  
[meet.google.com/fgt-jury-ajp](https://meet.google.com/fgt-jury-ajp)

**Join by phone**  
 (US) +1 316-247-4479  
 PIN: 901012572

[More phone numbers](#)

**When**  
 Tuesday Aug 23, 2022 - 2pm - 3pm (Eastern Time - New York)

**Guests**  
[corey@giantpartners.com](mailto:corey@giantpartners.com) - organizer  
[sfofelard@gmail.com](mailto:sfofelard@gmail.com)  
[jeremy@giantpartners.com](mailto:jeremy@giantpartners.com)  
[View all guest info](#)

**Reply to:** [sfofelard@gmail.com](mailto:sfofelard@gmail.com)

☐ Yes ☐ No ☐ Maybe [More options](#)

Invitation from Google Calendar  
 We are reposting this email because you are subscribed to calendar notifications. To stop receiving these emails, go to [Calendar settings](#), select this calendar, and change "Other notifications".  
 Forwarding this invitation could allow any recipient to send a response to the organizer. For advice on the guest list, please refer to organizers of their own invitation status, or modify your RSVP. [Learn more](#)

4 associations

✉ Email - GiantPartners/ListGiant- Follow up- Thank you for your recent inquiry regarding Data & Digital Marketing Services from Corey Weissman Pin Copy link: Aug 18, 2022 at 12:41 PM PST  
 Reply Forward Delete

Corey Weissman  
 to sfofelard@gmail.com  
 Open: 0 Close: 0

Hi Safa,

It was a pleasure speaking with you today in regards to helping you reach the growth and goals for [IMECompanion.com](https://IMECompanion.com).

I sent the invite for the discovery call tomorrow at 10 am PST/3pm EST to go over any and all questions before we put together the strategy presentation and present it to you early next week.

Link to Discovery call 8/19/22 at 10 am PST:

Meeting Link: [meet.google.com/nh-wjry-gvu](https://meet.google.com/nh-wjry-gvu)

Phone Link: [Join by phone](#)  
 (US) +1 415-905-0443 PIN: 810 110 5748

We can definitely help you with this request as we are a 20 year old full service data and digital marketing company. We own all of our data in-house and we have over 280 million consumers and over 28 million businesses with all the demographic and psychographic data you can imagine. We are also a full service digital marketing agency and we do the marketing for start-up companies to Fortune 500 companies such as BMW, Ferrari, QuickenLoans, Ethos&Allen and many more. It is all about a long-term mutually beneficial relationship for us!

We offer 3 different tiers of solutions based on our clients needs. We also have the 5 tiers listed on our website here: <https://giantpartners.com/pricing/>

---

**Tier 1: Targeted Data Lists:** This would be a 1 time purchase and depending on whether you want Business/Consumer data and depending on the contact information the minimum order ranges from \$500-\$1,000. The more data you purchase the better rate per record we can provide.

**Tier 2: A La Carte Packages:** This is where clients hire us for a 30 day period approx. to do either an email, social or google campaign. This also includes content creation, website development and more. The prices range from \$2,500-\$5,500 approx depending on which package you're interested in. This tier is more for an event you need to promote or something short-term.

**Tier 3: Data Driven Digital Marketing Partnerships:** This is where companies hire us to do their marketing. For the cost of 3 very skilled full-time Marketing Professionals, you get a team of 50+ people working on your marketing. It's an invaluable offer and this includes us creating content, marketing across email, social, google, optimizing your website, and much more. The monthly cost for our custom Data Driven Digital Marketing Partnerships are between \$5,000-\$10,000/month and that does not include your ad spend. We also do not charge you our monthly fee on the 2nd month which Jeremy will explain more on our presentation call.

If you are interested in this option, the next step would be to set up a discovery call with you and anyone from your team you feel should join the call and myself and our President of Digital Strategy, Jeremy Koenig. (Which we did for tomorrow at 10 am PST/3 pm EST.)

After the discovery call Jeremy will take his notes to our Digital team and we will put together a custom proposal for [IMECompanion.com](https://IMECompanion.com) that is detailed and has a timeline of what we will be providing you with and accomplishing every month. There is no obligation to do the discovery call or review the strategy at all.

---


With all of that being said, we are greatly looking forward to becoming a long-term resource for you and your team at [IMECompanion.com](https://IMECompanion.com) and building a long-term mutually beneficial relationship!

Please let me know your thoughts and if you have any questions or consent.

We look forward to speaking with you tomorrow.

All my best,

Corey  
**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
 Office: (805) 267-1375 ext 126  
 Direct: (805) 871-0423

  
 Connect on LinkedIn

4 associations

This contact was created from Offline Sources from CRM UI

Aug 18, 2022 at 12:04 PM PST

Subject: Conor McDaniel has made you the Contact owner of the contact "Safa Gelardi"



**HubSpot** <noreply@notifications.hubspot.com>  
to corey@giantpartners.com

Tue, Apr 23, 12:18 PM (9 d

You are viewing an attached message. IME Watchdog Mail can't verify the authenticity of attached messages.



**Conor McDaniel has made you the Contact  
owner of the contact "Safa Gelardi"**



**CONTACT**  
**Safa Gelardi**  
[sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)

View Contact

This message was sent to [corey@giantpartners.com](mailto:corey@giantpartners.com) because your preferences are set to receive notifications like this. You can change it in your [notification preferences](#) page.  
[giantpartners.com](https://giantpartners.com) (Hub ID: 4536250)

HubSpot, Inc.  
2 Canal Park

IME- Email Ex:

Workers Compensation IMEs, NYS WC Law allows IMEs to be videoed. You can use these videos to rebut a WC denial.

-NF IMEs where the Plaintiff is a Pedestrian, Bicyclist, or the NF Carrier is the City (MTA, NYPD, FDNY etc), ultimately when a Pedestrian or Bicyclist is hit by a motor vehicle, the NF IME really is a DME.

-Defense IMEs, IME Watchdogs can be and have been used as rebuttal witnesses against Defense Doctors.

It cost \$210 to put a case in suit, our average price per IME is less than \$200.

IME Watchdog can proudly say that it is the ONLY company in the NYC area that has successfully litigated against defense firms, and the only company with a proven track record of providing the most beneficial rebuttal testimonies against Defense Physicians.

Recently one of our clients stated the following:

["IME Watchdog was instrumental in securing a 7-figure verdict for our client in New York County. The defense medical doctor claimed to have performed a series of orthopedic exams in 1-2 seconds in order to account for an extremely short examination time. However, an IME Watchdog testified that the doctor, in fact, never performed the tests and never used a goniometer in testing the plaintiff's range of motion. Having spoken to the jury after the verdict was rendered, it is clear to me that the IME Watchdog's testimony helped convince the jury that the defense medical doctor was not credible."]

-Stephen D. Wagner III

Wingate, Russotti, Shapiro, Moses & Halperin, LLP]

The benefits and values of sending an IME Watchdog to your client's IMEs clearly outweigh the cost. Additionally, IME Watchdog services are a legal disbursement.

**From:** [IME Companions](#)  
**To:** [Tiffany Laszlo](#)  
**Subject:** FW: Denise Moore - IMEs  
**Date:** Wednesday, February 15, 2023 8:50:01 PM  
**Attachments:** [image004.png](#)  
[image001.png](#)  
[image002.png](#)  
[Page not found – IME Companions.pdf](#)

---

Kind Regards,

Safa Gelardi  
Chief Executive Officer



Office: 833-463-7767  
Direct: 718-749-4732  
9207 245<sup>th</sup> St  
Floral Park, New York 11001  
Email: [sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)  
[www.imecompanions.com](http://www.imecompanions.com)



---

**From:** Sherley Galdamez <[sg@belllg.com](mailto:sg@belllg.com)>  
**Sent:** Wednesday, February 15, 2023 8:29 PM  
**To:** IME Companions <[info@imecompanions.com](mailto:info@imecompanions.com)>  
**Subject:** Re: Denise Moore - IMEs

This is the second time using your service and every time I have reserved via internet the attached error message comes up.

Please confirm if this case was received for a 2/18/23 IME.

Best regards,

*Sherley Febus-Galdamez*  
**BELL LAW GROUP, PLLC**  
116 Jackson Avenue  
Syosset, NY 11530  
(516) 280-3008  
[sg@belllg.com](mailto:sg@belllg.com)



**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners Follow up  
**Date:** May 17, 2023 at 12:18  
**To:** IME Legal Reps IMELegalReps@Gmail.com  
**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Eugene!

I hope all is well with you, Safa mentioned that there was a court date this week and that we would start marketing after that. Have there been any updates on your side?

We look forward to hearing from you and starting the marketing efforts ASAP!

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)



## Subject: GiantPartners Follow up



**Corey Weissman** <corey@giantpartners.com>  
to IME Legal Reps

Wed, May 17, 2023, 1:

You are viewing an attached message. IME Watchdog Mail can't verify the authenticity of attached messages.

Hi Eugene!

I hope all is well with you, Safa mentioned that there was a court date this week and that we would start marketing that. Have there been any updates on your side?

We look forward to hearing from you and starting the marketing efforts ASAP!

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

**From:** Corey Weissman corey@giantpartners.com

**Subject:** GiantPartners Follow up- New Agreement

**Date:** March 20, 2024 at 11:21

**To:** eugene@imecompanions.com, IME Legal Reps imelegalreps@gmail.com, Safa Gelardi safagelardi@gmail.com, Safa Gelardi sgelardi@imecompanions.com

**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.

I would like to schedule a call with you and Safa and Jeremy and myself so we can discuss what you guys need and that way we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again soon.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

## Subject: GiantPartners Follow up- Partnership Update



**Corey Weissman** <corey@giantpartners.com>  
to Safa Gelardi, IME Legal Reps

Fri, May 19, 2023, 1:00 PM

Hi Safa and Eugene,

I hope all is well with you, unfortunately I have not been able to get a hold of Eugene and the number you gave me the voicemail isn't set up so I cannot leave a message.

I have our team asking for an update regarding the marketing for IME Legal Reps as you mentioned you would have an update for us after 5/15 sometime to let us know when we can start the marketing campaigns.

Do you have any updates for us or can we schedule a time to discuss any updates?

Let me know your thoughts.

All my best,

Corey  
**COREY WEISSMAN**  
[Giant Partners](#)  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



[Connect on LinkedIn](#)

## Subject: GiantPartners Follow up- Marketing for IME Legal Rep



**Corey Weissman** <corey@giantpartners.com>  
to eugene@imecompanions.com, IME Legal Reps

Tue, Jun 13, 2023,

You are viewing an attached message. IME Watchdog Mail can't verify the authenticity of attached messages.

Hi Eugene,

I hope all is well with you, I wanted to check in and see when we will start marketing for you IME Legal Reps?

Please let me know ASAP.

Thanks,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)



## Subject: GiantPartners Follow up- New Agreement



**Corey Weissman** <corey@giantpartners.com>

Wed, Mar 20, 1

to eugene@imecompanions.com, IME Legal Reps, Safa Gelardi, Safa Gelardi

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.

I would like to schedule a call with you and Safa and Jeremy and myself so we can discuss what you guys need and how we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)



## Subject: GiantPartners Follow up- Partnership Update



**Corey Weissman** <corey@giantpartners.com>  
to Safa Gelardi, IME Legal Reps

Fri, May 19, 2023, 1:00 PM

Hi Safa and Eugene,

I hope all is well with you, unfortunately I have not been able to get a hold of Eugene and the number you gave me the voicemail isn't set up so I cannot leave a message.

I have our team asking for an update regarding the marketing for IME Legal Reps as you mentioned you would have an update for us after 5/15 sometime to let us know when we can start the marketing campaigns.

Do you have any updates for us or can we schedule a time to discuss any updates?

Let me know your thoughts.

All my best,

Corey  
**COREY WEISSMAN**  
[Giant Partners](#)  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



[Connect on LinkedIn](#)

## Subject: GiantPartners/ListGiant - Follow up- Data & Digital Marketing Resource



**Corey Weissman** <corey@giantpartners.com>  
to Safa Gelardi

Tue, Mar 12, 11

Hi Safa,

I hope all is well with you, I know it's been awhile since you and I last spoke. I wanted to check in and see how bus is going and if you ended up settling things with that lady?

Either way we hope to still be a resource for you and Eugene and would love to discuss working together again in the future.

Please let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)



## Subject: GiantPartners- Meeting Link



**Corey Weissman** <corey@giantpartners.com>  
to Safa Gelardi

Mon, Apr 10, 2023, 1:00 PM

You are viewing an attached message. IME Watchdog Mail can't verify the authenticity of attached messages.

Hi Safa,

Here is the link to the meeting just in case:

[meet.google.com/dxf-dget-xww](https://meet.google.com/dxf-dget-xww)cont

[Join by phone](#)

(US) +1 662-434-4884 PIN: 465 574 345#

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)



**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners/ListGiant - Follow up- Data & Digital Marketing Resource  
**Date:** March 12, 2024 at 10:47  
**To:** Safa Gelardi safagelardi@gmail.com  
**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Safa,

I hope all is well with you, I know it's been awhile since you and I last spoke. I wanted to check in and see how business is going and if you ended up settling things with that lady?

Either way we hope to still be a resource for you and Eugene and would love to discuss working together again in the future.

Please let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners/ListGiant - Follow up- Data & Digital Marketing Resource  
**Date:** March 12, 2024 at 10:47  
**To:** Safa Gelardi safagelardi@gmail.com  
**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Safa,

I hope all is well with you, I know it's been awhile since you and I last spoke. I wanted to check in and see how business is going and if you ended up settling things with that lady?

Either way we hope to still be a resource for you and Eugene and would love to discuss working together again in the future.

Please let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

Switch to the refreshed navigation [Learn](#)

Contacts Conversations Marketing Sales Commerce Service Automation Reporting Template Marketplace Partner

Search HubSpot

Companies (1) + Add

Primary

IME Companions  
imecompanions.com [17](#)  
+1 (800) 439-9921  
Last activity date: 05/20/2024 9:22 AM PDT

View associated companies

Deals (8) + Add

IME Companions: DG : 238416-6 : Recurring Business  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

IME Companions: DG : 238416-5 : Recurring Business  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

IME Companions: DG : 238416-4 : Recurring Business  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

IME Companions: DG : 238416-3 : Recurring Business  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

IME Companions: DG : 238416-2 : Recurring Business  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

Show more View associated deals

Attachments [New](#) + Add

See the files attached to your activities or uploaded to this record.

Contacts (0) + Add

See the people associated with this record.

Overview Activities

Search activities

Activity Notes Emails Calls Tasks Meetings

Filter by: Filter activity (1/39) All users All teams

March 2024

Email - GiantPartners Follow up- New Agreement from Corey Weissman

Corey Weissman  
To: augene@imecompanions.com, DME Legal Reps, Sofia Gelardi, Sofia Gelardi  
Opens: 4 Closes: 0

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.



I would like to schedule a call with you and Sofia and Jeremy and myself so we can discuss what you guys need and that way we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again soon.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners, Database Marketing Advisor  
Call: (805) 267-1575 ext 128  
Text: (805) 625-9332  
Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)  
Calendar: [Book meeting](#)  
LinkedIn: [Connect](#)

4 associations

Email - GiantPartners/ListGiant - Follow up- Data & Digital Marketing Resource from Corey Weissman

Corey Weissman  
To: Sofia Gelardi  
Opens: 1 Closes: 0

Hi Sofia,

I hope all is well with you, I know it's been awhile since you and I last spoke, I wanted to check in and see how business is going and if you ended up setting things with that lady?



Either way we hope to still be a resource for you and Eugene and would love to discuss working together again in the future.

Please let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners, Database Marketing Advisor  
Call: (805) 267-1575 ext 128  
Text: (805) 625-9332  
Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)  
Calendar: [Book meeting](#)  
LinkedIn: [Connect](#)

1 association

February 2024

Email - ListGiant/GiantPartners- Follow up- Checking in from Corey Weissman

Corey Weissman  
To: Sofia Gelardi  
Sent

Hi Sofia,

Happy New Year! I hope all is well with you, I wanted to check in and see if you are still working with Eugene at IME? How's everything going on your side?



We hope to still be a resource for you for any targeted data list or digital marketing services.

Please let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners, Database Marketing Advisor  
Call: (805) 267-1575 ext 128  
Text: (805) 625-9332  
Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)  
Calendar: [Book meeting](#)  
LinkedIn: [Connect](#)

1 association

June 2023

Email - Re: IME Legal Reps - Website Review from Corey Weissman

Corey Weissman  
To: IME Legal Reps, Sofia Gelardi, Dan Hiller, Connor McDevine, Emilee Bedard  
Hi Eugene!

I hope all is well with you and Sofia. I wanted to check in as I have been unable to reach you over the phone. Is there a good day or time we can talk more about when you would like us to start the marketing campaign efforts?

Please let me know if you have any questions or concerns.

My direct line is: 805-873-0425.

We look forward to hearing from you soon!

Thanks,

Corey

**COREY WEISSMAN**  
 corey@giantpartners.com  
 (805) 267-1575 ext 126  
[Schedule meeting](#)

...

[View thread \(9\)](#)

10 associations +

✉ Email - Re: GiantPartners Follow up Marketing Efforts from Corey Weissman

Pin Copy link Jun 9, 2023 at 8:50 AM PDT

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)

**Corey Weissman**  
 to Sofia Georghi, JME Legal Reps, JME Legal Reps -  
 1 Open: 2 Clicks: 0

Hi Eugene and Sofia,

I hope all is well with you both, I wanted to see if you could please update us regarding the marketing efforts for JME Legal Reps?

Our team is awaiting an update from you since we started updating your website back in April.

If either of you could please update us that would be greatly appreciated.

Let me know if you have any questions or concerns!

All my best,

Corey

**COREY WEISSMAN**  
 corey@giantpartners.com  
 (805) 267-1575 ext 126  
[Schedule meeting](#)

...

[View thread \(2\)](#)

7 associations +

✉ Email - GiantPartners Follow up Marketing Efforts from Corey Weissman

Pin Copy link Jun 9, 2023 at 2:08 PM PDT

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)

**Corey Weissman**  
 to Sofia Georghi, JME Legal Reps, 453625@cc.hubspot.com -  
 1 Open: 2 Clicks: 0

Hi Eugene and Sofia

I hope all is well with you both, unfortunately I haven't been able to get a hold of either of you!

I wanted to check in regarding the court date in May that you mentioned you wanted to wait until that was over to begin the marketing efforts.

I have our team asking what is going on with this partnership.

Could either one of you please update me regarding when we can start marketing?

All my best,

Corey

**COREY WEISSMAN**  
 Giant Partners, Database Marketing Advisor  
 Call: (805) 267-1575 ext 126  
 Text: (805) 625-9332  
 Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)  
 Calendar Book meeting  
 LinkedIn Connect

**GIANTPARTNERS**

...

[View thread \(2\)](#)

7 associations +

✉ Email - Re: GiantPartners Follow up- Update for IMELegalReps & Eugene from Corey Weissman

Pin Copy link Jun 1, 2023 at 2:28 PM PDT

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)

**Corey Weissman**  
 to Sofia Georghi, Sofia Georghi, JME Legal Reps -  
 1 Open: 2 Clicks: 0

Hi Sofia and Eugene,

I hope all is well with you, I wanted to check in and see if you have any updates regarding the marketing for JME Legal Reps?

We were waiting for your response on 5/15 regarding the court date you mentioned and we hope to hear from you soon!

Please let me know if there's a good day or time we can talk.

All my best,

Corey

**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist  
 corey@giantpartners.com  
 Office: (805) 267-1575 ext 126  
 Direct: (805) 871-9425

**GIANTPARTNERS**[Connect on LinkedIn](#)

...

[View thread \(2\)](#)

4 associations +

May 2023

✉ Email - GiantPartners Follow up- Update for IMELegalReps & Eugene from Corey Weissman

Pin Copy link May 30, 2023 at 2:13 PM PDT

[Reply](#) [Forward](#) [Delete](#)

**Corey Weissman**  
 to Sofia Georghi -  
 1 Open: 1 Clicks: 0

Hi Sofia,

I hope all is well with you, I wanted to check in and let you know we have been unsuccessful in reaching Eugene and we would like to know what's going on with IMELegalReps.

Can we start marketing? Can you have Eugene call us?

He hasn't picked up his phone and won't respond via email.

Please let me know ASAP

Thanks,

Corey

**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist

2023-04-25 10:40 AM

Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



**GIANTPARTNERS**  
America's #1 Data Driven Marketing Agency

[Connect on LinkedIn](#)

...

[View thread \(2\)](#)

[4 associations](#)

**Email - GiantPartners Follow up- Partnership Update** from Corey Weissman

[Pin](#) [Copy link](#) May 19, 2023 at 11:58 AM PDT



**Corey Weissman**  
to Sofia Gelardi, IME Legal Reps -

Opens: 3 Clicks: 0

Hi Sofia and Eugene,

I hope all is well with you, unfortunately I have not been able to get a hold of Eugene and the number you gave me Sofia the voicemail isn't set up so I cannot leave a message.

I have our team asking for an update regarding the marketing for IME Legal Reps as you mentioned you would have an update for us after 5/15 sometime to let us know when we can start the marketing campaign.

Do you have any updates for us or can we schedule a time to discuss any updates?

Let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



**GIANTPARTNERS**  
America's #1 Data Driven Marketing Agency

[Connect on LinkedIn](#)

...

[7 associations](#)

April 2023

**Email - Re: 025385** from Conor McDaniel

[Pin](#) [Copy link](#) Apr 25, 2023 at 8:57 AM PDT



**Conor McDaniel**  
to Sofia Gelardi, IME Legal Reps, Estefania Sedano -

Opens: 3 Clicks: 0

Hey Sofia - can you clear your cache and check on your end?

We've removed the hosting IP from the DNS records.

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151

[Connect on LinkedIn](#)



**GIANTPARTNERS**  
America's #1 Data Driven Marketing Agency

[Connect on LinkedIn](#)

...

...

[View thread \(2\)](#)

[4 associations](#)

**Email - Re: 025385** from Conor McDaniel

[Pin](#) [Copy link](#) Apr 25, 2023 at 8:42 AM PDT



**Conor McDaniel**  
to Sofia Gelardi -

Opens: 1 Clicks: 0

We are in - thank you

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151

[Connect on LinkedIn](#)



**GIANTPARTNERS**  
America's #1 Data Driven Marketing Agency

[Connect on LinkedIn](#)

...

...

[View thread \(2\)](#)

[4 associations](#)

**Email - Re: 025385** from Estefania Sedano

[Pin](#) [Copy link](#) Apr 25, 2023 at 8:41 AM PDT



**Estefania Sedano**  
to Sofia Gelardi, Corey Weissman -

Opens: 3 Clicks: 0

Thank you!

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext 150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Tue, Apr 25, 2023 at 10:40 AM Sofia Gelardi <[safogelardi@gmail.com](mailto:safogelardi@gmail.com)> wrote:

...

[4 associations](#)

**Email - IME Legal Reps - Updates** from Estefania Sedano

[Pin](#) [Copy link](#) Apr 26, 2023 at 12:13 PM PDT



**Estefania Sedano**  
to Sofia Gelardi, Conor McDaniel, Corey Weissman, Manuel Cabera -

Opens: 7 Clicks: 0

Hey Sofia,

Hope all is well!

I wanted to check in and send you an update on the work in progress - see below.

**Branding**

- Currently, the logo and colors mockups are in Quality Control, once we have approval from Scott I will be sending these

**Website updates**

- On Friday we moved the website development to the new domain: <https://imelegalreps.com/> and while we get the new branding approved and ready, we have removed any IME Companion logo or wording in the website.

**New Social & Paid Accounts**

- In order to set up the new Social Media and Paid accounts (such as Google Ads and LinkedIn), there are two ways to do it:
  - You can share the login information of the email you want to register all accounts.
  - Or we can schedule a meeting and do it together.

For the meeting, we can do:

**Wednesday** at 10:00 am or 1:00 pm - 3:30 pm PDT

**Thursday** at 9:00 am - 1:00 pm PDT

Let me know what works for you!

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

9 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 9:44 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Conor McDonald, imelegalreps@gmail.com, Corey Williamson, Scott Owen, Steve Page, ...  
 1 Open: 24 Clicks: 0

Hey Sofia,

The team needs to get login approval. They have sent a Godaddy code to your email, could you please provide it?

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 9:15 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Conor McDonald, imelegalreps@gmail.com, Corey Williamson, Scott Owen, Steve Page, ...  
 1 Open: 19 Clicks: 0

Hey Sofia,

Currently working on it! Let me check in with the team.

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 8:59 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Conor McDonald, imelegalreps@gmail.com, Corey Williamson, Scott Owen, Steve Page, ...  
 1 Open: 13 Clicks: 0

Good morning Sofia,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 13, 2023 at 2:43 PM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Conor McDonald, Sofia Gelardi, imelegalreps@gmail.com, Corey Williamson, Scott Owen, Steve Page, ...  
 1 Open: 18 Clicks: 0

Hi Sofia,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - GP - IME Legal Reps from Conor McDonald** Pin Copy link Apr 13, 2023 at 10:55 AM PDT  
Reply all Reply Forward Delete

**Conor McDonald**  
to Sofia Gelardi, imelegalreps@gmail.com, Corey Williamson, Estefania Sedano, Scott Owen, Steve Page, ...  
 1 Open: 44 Clicks: 0

Hey Sofia,

I hope all has been well! It's great to have you back on board!

I want to introduce you to your Account Manager, Ekaterina Sedano! You're in excellent hands with Ekaterina.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the DME Companions website over to the [linklegalreps.com](https://linklegalreps.com) domain and rebrand for DME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For DME Legal Reps, can we use the same colors as DME Companions?

Thank you, Sofia!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



View thread (11)

12 associations

✉ Email - GiantPartners- Meeting Link from Corey Weissman

Pin Copy link Aug 30, 2022 at 11:02 AM PDT

**Corey Weissman**

To: Sofia Sedano

Re: Sofia Sedano

Hi Sofia,

Here is the link to the meeting just in case:

[meet.google.com/za7-tqgr-rvaw](https://meet.google.com/za7-tqgr-rvaw) content\_copy

Join by phone  
(US) +1 662-434-4834 PIN: 485 574 3458

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-9425



[Connect on LinkedIn](#)

View thread (1)

5 associations

October 2022

✉ Email - Re: Subdomain for DME from Tiffany Lazlo

Pin Copy link Oct 12, 2022 at 12:13 PM PDT

**Tiffany Lazlo**

To: Sofia Sedano, Steve Page, Corey Weissman

Hi Sofia,

A code was sent to your email from Meta we need that as soon as you can send it over.

Thank you.

**Tiffany Lazlo**  
Giant Partners  
Account Manager  
Office: (805) 267-1575 x 160  
Text: (805) 828-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

View thread (8)

10 associations

✉ Email - Re: Subdomain for DME from Tiffany Lazlo

Pin Copy link Oct 12, 2022 at 10:06 AM PDT

**Tiffany Lazlo**

To: Sofia Sedano, Steve Page, Lumina Support, Conor McDaniel, Corey Weissman

Hi Sofia,

Regarding Vera's email please let us know if the credentials listed below are correct as we were having issues accessing the domain.

- Hosting/Domain Service Name (ex. GoDaddy)
- Username: [info@linklegalreps.com](mailto:info@linklegalreps.com)
- Password: Pupa207H

Best,

**Tiffany Lazlo**  
Giant Partners  
Account Manager  
Office: (805) 267-1575 x 160  
Text: (805) 828-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

View thread (8)

10 associations

✉ Email - Re: Subdomain for DME from Lumina Support

Pin Copy link Oct 12, 2022 at 9:54 AM PDT

**Lumina Support**

To: Sofia Sedano, Tiffany Lazlo, Steve Page, Conor McDaniel, Corey Weissman

Hi Tiffany and Sofia,

These appear to be the credentials for the WP backend.

Sofia, the team will need credentials to the domain registrar which from our records looks to be GoDaddy.com

Hope this helps.

**Vera Khodasevich**  
Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010





...

[View thread \(8\)](#)

10 associations

Re: Email - Re: Subdomain for IME from Tiffany Lazlo

Pin Copy link Oct 17, 2022 at 9:40 AM PDT



**Tiffany Lazlo**

To: Sofia Gerasi, Lumina Support, Steve Page, Connor McDaniel, Corey Williamson

Hi Sofia,

Hope you had a great weekend.

Thank you so much for the password updates, I'll send this over to the team and let you know if we have any questions.

Best,

**Tiffany Lazlo**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

...

[View thread \(8\)](#)

10 associations

Re: Email - Re: Subdomain for IME from Tiffany Lazlo

Pin Copy link Oct 18, 2022 at 9:27 AM PDT



**Tiffany Lazlo**

To: Sofia Gerasi, Lumina Support, Steve Page, Yenu Liem, Corey McDaniel, Corey Williamson

Hi Vera and Sofia,

Happy Friday and thank you for the updates.

Our team is waiting on that information so as soon as we hear back from you we can move forward and will let you know if we have any other questions.

Have a wonderful weekend.

Best,

**Tiffany Lazlo**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

...

[View thread \(8\)](#)

10 associations

Re: Email - Re: Subdomain for IME from Lumina Support

Pin Copy link Oct 18, 2022 at 9:29 AM PDT



**Lumina Support**

To: Steve Page, Sofia Gerasi, Yenu Liem, Tiffany Lazlo, Connor McDaniel

Hi Steve,

Thanks for sending this update!

This looks like an adjustment that needs to be made on the domain level. This is separate from the server and, if IME approves, full access can be granted to the domain registrar as this is their own unique account.

The credentials that we have for IME's domain registrar no longer work, I imagine the password may have been changed some time ago.

@Sofia Gerasi should be able to provide these credentials.

Please let us know if you need any further assistance.

Best,

**Vera Khodasevich**

Project Manager, Customer Service



1123 Broadway #1018

New York, NY 10010

822-444-3838

[lumina.nyc](http://lumina.nyc)



**Forbes**

Business Council

2020

Member

2020

Member

...

[View thread \(8\)](#)

10 associations

Re: Email - Subdomain for IME from Steve Page

Pin Copy link Oct 13, 2022 at 1:28 PM PDT



**Steve Page**

To: Tiffany Lazlo, Sofia Gerasi, Lumina Support, Connor McDaniel

Open: 0 Click: 0

Hey Guys,

Our mistake. We changed the subdomain.

Please use this information below

Type: CNAME

Name: go

Value: [333549876310437a0d4dfo40c07oc8d.unbouncepages.com](https://333549876310437a0d4dfo40c07oc8d.unbouncepages.com)

TTL: 1 hour

Let us know if you have questions.

STEVEN PAGE



Giant Partners  
VP of Digital Strategy  
Office: (805) 367-1575 x148  
Text: (805) 666-1790

**GIANTPARTNERS**

Connect on LinkedIn

View Thread (8)

10 associations

September 2022

Email - Re: List of counties in and around Atlanta Georgia from Corey Weissman

Pin Copy link Sep 30, 2022 at 3:08 PM PST

Reply all Reply Forward Delete



**Corey Weissman**  
VP of Digital Strategy, Giant Partners  
Open: 0 Close: 0

Hi Yusef and Sofia,

Thank you for sending over the various geographies you want to target.

Are there any others or is this all of it including the other emails?

Please let me know.

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (805) 367-1575 ext 126  
Direct: (805) 671-0421



**GIANTPARTNERS**

Connect on LinkedIn

View Thread (4)

5 associations

Email - GP - CRM User from Conor McDaniel

Pin Copy link Sep 30, 2022 at 9:10 AM PST

Reply all Reply Forward Delete



**Conor McDaniel**  
To: Sofia Gotsis, Tiffany Luzzo, Corey Weissman  
Open: 4 Close: 0

Hey Sofia,

I hope all is well.

Can you provide me with the name of the CRM you are using as well as the login credentials?

With Tiffany being on holiday, you can direct any questions to me for the following week. Thank you!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
conor@giantpartners.com  
(805) 367-1575 x151  
Connect on LinkedIn



**GIANTPARTNERS**

View Thread (4)

7 associations

Email - Re: IHE Follow Up from Conor McDaniel

Pin Copy link Sep 30, 2022 at 8:19 AM PST

Reply all Reply Forward Delete



**Conor McDaniel**  
To: Lumina Support, Tiffany Luzzo, Sofia Gotsis, Jimmy Page  
Sent

Hey Vera,

No worries at all.

When we have fully built the new website, we will send over instructions for you to host it.

Thank you, Vera!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
conor@giantpartners.com  
(805) 367-1575 x151  
Connect on LinkedIn



**GIANTPARTNERS**

On Fri, Sep 30, 2022 at 7:42 AM Lumina Support <support@lumina.nyc> wrote:

Hi Tiffany,

Sorry for the delayed reply here. I didn't realize you were looking for access to the server, the credentials that were shared were to the site's WordPress backend.

We won't be able to grant direct access to the server as it is shared with other client sites, but can certainly discuss with the team how to get the things done that you need done.

So, could you please elaborate on your exact needs for the site?

Thanks,

**Vera Khodasevich**  
Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010  
212.444.2458  
lumina.nyc



On Tue, Sep 27, 2022 at 7:53 PM Tiffany Luzzo <tiffany@giantpartners.com> wrote:

Our website developer is still having a hard time logging into the website hosting. Please use the information below and let us know if there is another login that we can use.

## Login

Sign in to your account to continue.

Login Details incorrect. Please try again.

Email Address

name@example.com

Password

Forgot Password?

Password

Login

☐ Remember Me

• Pub: 8N0JwW4jF2w8llR  
• Ufr: dJadamin@giantpartners.com

• Hosting/Control Service Name  
• Username: tiff@luminacompanions.com  
• Password: Pasa00079

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 5:55 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Thank you so much!

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 11:40 AM Lumina Support <support@lumina.nyc> wrote:  
Thanks Tiffany, hope you had a great weekend as well.

Just created a user for that email, temporary password:  
• 03Uthwshgfgzx7HqW0caPhod

Just FYI for future needs, @Sofia (Saland) you're also able to create users on the site's backend via Users > Add New ( screenshot)

Hope this helps!

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway #1015  
New York, NY 10010  
212.444.2658  
lumina.nyc



On Mon, Sep 26, 2022 at 2:26 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Hi Team,

Thank you so much, and I hope you had a great weekend.

Please let us know if you can add our [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com) email to the website so that our team members can have access as well.

Best Regards,

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 8:24 AM Lumina Support <support@lumina.nyc> wrote:  
Hi Tiffany,

We just created a new user for you on the website, you should be getting an email from the site about this as well.

Just in case, I'm also posting credentials here:

[https://lmc.companions.com/admin\\_login](https://lmc.companions.com/admin_login)  
User: your email  
Temporary Password: 0jxNehUvFmb7SRdxuX6

Note: the password should be updated once you've logged into the backend.

Let us know if this all suffices or if you're in need of any further access or assistance.

Best,

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010  
312.444.2658  
[lumina.nyc](http://lumina.nyc)



On Fri, Sep 23, 2022 at 2:29 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa and Lumina Support,

Thank you all and happy Friday.

We are looking to access the website on our end so that we can make some edits. Please let us know what you need from our team to get this started.

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
**Giant Partners**  
Account Manager  
Office: (909) 287-1575 x 160  
Text: (909) 826-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Fri, Sep 23, 2022 at 9:37 AM Safa Gerardi <[safagerardi@gmail.com](mailto:safagerardi@gmail.com)> wrote:  
Dear Tiffany, this is the Lumina Support email. they are very good at responding. If they please let me know and I will give them a call.

Please meet Tiffany from my marketing team, please give them any access they need for the website.

Safa Gerardi

On Thu, Sep 22, 2022 at 7:59 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

The hosting / domain credentials did not work for the Lumina hosting. Is there an email to a representative that you were in contact with that we can reach out to?

- <https://www.luminahosting.com/>
- Hosting platform: Hosting/Domain Service Name (ex. GoDaddy)
- Username: [info@imecompanions.com](mailto:info@imecompanions.com)
- Password: Pupa0507!

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
**Giant Partners**  
Account Manager  
Office: (909) 287-1575 x 160  
Text: (909) 826-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 4:12 PM Safa Gerardi <[safagerardi@gmail.com](mailto:safagerardi@gmail.com)> wrote:  
Yes I'd like to meet before your vacation. Any day before the 28th is good for me. And we can keep the logo.

On Thu, Sep 22, 2022 at 7:20 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Thank you for the update.

We will work with what we have and see what we can do. Also just to confirm for the team would you like us to stick with the current logo and branding as we are staying with the IME Companions name?



If you want us to do some variations for this current logo please let us know. Also please let me know what day works best for you this coming week to set up a short 30 min meeting. I will be out of town from the 30th-Oct 7th so just a week but I'd like to meet before I head out so we can go over everything.

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
**Giant Partners**  
Account Manager  
Office: (909) 287-1575 x 160  
Text: (909) 826-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 3:32 PM Safa Gerardi <[safagerardi@gmail.com](mailto:safagerardi@gmail.com)> wrote:  
<https://youtu.be/vb8Qc-q-wmoQ>

On Thu, Sep 22, 2022 at 6:29 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Thank you for the information.

I'll have the team look into that and let you know if we have any questions. Also regarding the video from the website our team wanted to know if you had that video without music so that we can trim and splice it into smaller videos for new content.

If you are able to get that please add it to the google drive folder and let me know as that would be greatly appreciated.

Best,

**Tiffany Laszlo**  
**Giant Partners**  
Account Manager  
Office: (909) 287-1575 x 160  
Text: (909) 826-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 1:52 PM Safa Gerardi <[safagerardi@gmail.com](mailto:safagerardi@gmail.com)> wrote:  
Hi Tiffany, I believe it's word press and the web developer is hosting it. It's Lumina their phone number is 2124442658.

On Thu, Sep 22, 2022 at 12:12 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Hope your week is going well.

Our team wanted to know if you knew what hosting platform the current website was built on. We have tried the credentials from the document on a few different hosting platforms but they don't seem to be working so you think you could as the original developers that were working on the website?

Hosting platform: Hosting/Domain Service Name (ex. GoDaddy)

Username: Info@imecompanion.com

Password: Pupa0507!

Looking forward to hearing from you soon!

Best,

**Tiffany Lazlo**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

On Fri, Sep 16, 2022 at 12:47 PM Tiffany Lazlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Sofia,

Hope this email finds you well.

Our team also wanted to know if we have your approval to use the recommended website template below. This will be the layout for the wilderness civil site that we'll be working on for you.

- <https://www.elegantthemes.com/examples/legal-shield/>

Looking forward to hearing your thoughts.

Best,

**Tiffany Lazlo**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

On Fri, Sep 16, 2022 at 12:38 PM Tiffany Lazlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Sofia,

Happy Friday, how your week is going well.

Our team wanted to get your confirmation on which branding and logo we should use/create for the website and ad content. Should we use IME or DME Companions?

We also wanted to confirm the pricing on some of the services and the offers that we went over such as the \$175 per hour and the \$99 an hour for a basic report and if our team can use those as a specific call to action on ad creatives.

Also, please add any branding and marketing materials to the [Marketing Collateral](#) Google drive folder. Our team was asking if you had the raw video file for IME, the one on the website. We'd like to work with that content to make other ad variations.

For all the account access, please let me know a good time to set up a quick phone call to go over adding GP to the accounts. That way we don't run into any issues logging in with the provided credentials.

Looking forward to hearing from you soon.

Best,

**Tiffany Lazlo**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

8 associations

✉ Email - Re: Zip codes for Harris county from Corey Weissman

Pin Copy link Sep 21, 2022 at 12:48 PM PDT

**Corey Weissman**

to Sofia Gelardi

1 Opened 0 Clicked 0

Hi Sofia,

I received those what about Georgia, New York, New Jersey and Pennsylvania?

We would want to submit all the geography at once if you can send those as well.

Please let me know.

Corey

**COREY WEISSMAN**

**Giant Partners**

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1 Opened 0 Clicked 0

View thread (8)

4 associations

✉ Email - Re: Zip codes for Harris county from Sofia Gelardi

Pin Copy link Sep 21, 2022 at 12:43 PM PDT

**Sofia Gelardi**

to Corey Weissman

Hi Corey, I sent you the counties and the zip codes in each county for Texas and Miami Florida.

1 Opened 0 Clicked 0

View thread (8)

4 associations

✉ Email - Re: Zip codes for Harris county from Corey Weissman

Pin Copy link Sep 21, 2022 at 10:19 PM PDT

**Corey Weissman**

to Sofia Gelardi

1 Opened 0 Clicked 0

Hi Sofia,

Thank you for starting to send over the geography, I will wait until you send the geography for each state, so it looks like you're doing just zip codes? In other states you can also target counties, zip radius or the full state. Or you can just supply zip codes in each state that is fine too.

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania

- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta Georgia
- Florida, Orlando to Miami 100-mile radius

This is what you sent previously and based on the zip codes so far we have:

TX, Harris county zip codes, Fort Bend, and Galveston zip codes.

FL- Miami Dade zip codes.

Let me know if you have any questions or need anything else.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

View thread (3)

4 associations

Email - GiantPartners- Geography Request for the Data for Marketing Efforts from Corey Weissman

Pin Copy link Sep 27, 2022 at 2:23 PM PDT



**Corey Weissman**  
To Sofia Gaidis -

Open: 1 Close: 0

Hi Sofia,

I hope all is well with you, I know you have been very busy however I would like to try and get the data submitted this week if possible.

The only hold up is the geography, we need to know which areas you are willing to receive leads from based on zip codes, zip radius, county/ metro area, cities, states or nationwide.

This is what we have currently:

Previous Geography provided by SME:

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania
- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta Georgia
- Florida, Orlando to Miami 100-mile radius

If you can please re-send this but confirm for each area what cities, counties, zip codes, zip radius, metro areas or full states you want to target?

For example:

1. Texas- Dallas and Harris County only
2. New York - Tri-State Area- Cities - New York, Long Island, etc.
3. New Jersey- Target Zip codes - xxxxx, xxxxx.
4. Georgia- Target Atlanta Metro Area.
5. Florida- Do a 100 mile zip radius from 32501- 100miles.

Please let me know if there are any questions or concerns as I recall you were going to send this to us last week on Friday.

We are greatly looking forward to receiving this and I believe Tiffany is trying to get a call scheduled with you ASAP as well.

Let me know your thoughts;

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

View thread (3)

4 associations

Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

Pin Copy link Sep 28, 2022 at 3:53 PM PDT



**Corey Weissman**  
To Sofia Gaidis -

Open: 1 Close: 0

Hi Sofia,

I hope you had a great weekend! I wanted to check in and see if you and your husband are able to get me the geography this week for where you want to target in each state?

We are awaiting your response and hope to hear from you this week so we can get this data pulled.

Let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

View thread (3)

4 associations

Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

Pin Copy link Sep 28, 2022 at 3:53 PM PDT



**Corey Weissman**  
To Sofia Gaidis -

Open: 1 Close: 0

Hi Sofia,

I hope all is well with you and your husband!

I wanted to check in and see if you have the geography ready for us for the data?

Please let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

4 associations

✉ Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 21, 2022 at 9:20 AM PDT



**Corey Weissman**  
To: Saba Gaheri

1 Open 1 Closed 0

Hi Saba,

I hope all is well. I wanted to follow up and see if you have the geography ready for us?

Let me know if you have any questions!

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

4 associations

✉ Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 30, 2022 at 9:49 AM PDT



**Corey Weissman**  
To: Saba Gaheri

1 Open 2 Closed 0

Hi Saba,

So I just met with Jeremy and our team and all we need is that geography from you so if you can send it today I can get the data going today, there is no need to rip on a call again for the data since as we have all the details from you unless there are any changes?

**PERSONAS: A (B2B) - Personal Injury Attorney Firms, B (B2B) - Workers Compensation Attorneys Primary Contacts: Attorneys, Office Managers, Clerks (IME, Calendar), Paralegals Decision Makers: Owners, Partners, Principal Officers Name: "Super Lawyers" - Lawyers that go to trial/court (NY State Trial Lawyer's Association), when lawyers settle out of court they do not value IME Compensations report/benefit, work with plaintiffs.**

Please send the geography for each state at your earliest convenience.

Please let me know if you have any questions or concerns.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

4 associations

✉ Email - GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 30, 2022 at 9:27 AM PDT



**Corey Weissman**  
To: Saba Gaheri

1 Open 3 Closed 0

Hi Saba,

So here is what I have from our conversation regarding geography:

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania
- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta Georgia
- Florida, Orlando to Miami 100-mile radius

If you can please re-send this but confirm for each area what cities, counties, zip codes, zip radius or full state you want to target? For example:

1. Texas- Dallas and Harris County only
2. New York - Tri-State Area- Cities - New York, Long Island, etc.
3. New Jersey- Target Zip codes - xxxxx, xxxxx;
4. Georgia- Target Atlanta Metro Area.
5. Florida- Do a 100 mile zip radius from .33551- 100miles.

If you can please have this for our call tomorrow morning that would be greatly appreciated.

Please let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

4 associations

✉ Email - GiantPartners- Data Overview Call from Corey Weissman

[Pin](#) [Copy link](#) Sep 30, 2022 at 9:02 AM PDT



Corey Weissman  
To: Sofia General -  
Open: 1 Click: 0

Hi Sofia,

I hope you're doing well, I am on the call right now for our 9 am PST/12 pm EST call to go over the data.

Do we need to reschedule or does this work for you still?

Here is the meeting link just in case:


[meet.google.com/qzv-vllg-nyt](https://meet.google.com/qzv-vllg-nyt)

Let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0423



[Connect on LinkedIn](#)

4 associations

August 2022

✉ Email - Fwd: GP - Welcome to Giant Partners! from Corey Weissman Pin Copy link Aug 29, 2022 at 11:40 AM PDT  
Reply all Reply Forward Delete

Corey Weissman  
To: Sofia General, Tiffany Luzzo, Conor McDaniel -  
Open: 62 Click: 0

Hi Sofia,

I hope all is well, and it was a pleasure speaking with you briefly today.

I wanted to forward you the email Tiffany sent just in case you didn't receive it.

If you can fill out the onboarding information and provide any emails of other members on your team for access to the google drive as soon as possible that would be great so we can schedule the kick-off call.

Please let us know what days/times work best for you and your team for the kick-off call once you have completed the documents sent by Tiffany.


Also if you could, please "Reply All" to Tiffany's email so everyone gets your responses.

Please let us know if you have any questions or concerns.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0423



[Connect on LinkedIn](#)

5 associations

✉ Email - GP - Welcome to Giant Partners! from Conor McDaniel Pin Copy link Aug 26, 2022 at 1:07 PM PDT  
Reply all Reply Forward Delete

Conor McDaniel  
To: Sofia General, Tiffany Luzzo, Corey Weissman -  
Open: 62 Click: 0

Hey Sofia,


My name is Conor McDaniel, and I'm the Director of Operations here at Giant Partners. It's a pleasure to e-meet you!

Your Account Manager, Tiffany Luzzo, will be reaching out to you today to kick off our partnership with next steps.

You are in great hands with Tiffany! My "door" is always open should you have any questions throughout the process. Feel free to reach out to me.

Cheers,

**CONOR MCDANIEL**  
Giant Partners  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



7 associations

✉ Email - Re: GiantPartners/ListGiant Follow up- Partnership Link Inside from Corey Weissman Pin Copy link Aug 26, 2022 at 7:55 AM PDT  
Reply Forward Delete

Corey Weissman  
To: Sofia General -  
Open: 1 Click: 0

Hi Sofia,

That would not be us, as we haven't sent you the onboarding documents and kick off call details which you will be receiving today from us.


Our Digital team will be reaching out to you today and I will be CC'd on the email as well.

Please let me know if you have any other questions or concerns.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0423



[Connect on LinkedIn](#)

[View thread \(3\)](#) [4 associations](#)

**Email - Re: GiantPartners/ListGiant Follow up- Partnership Link Inside** from Safa Gelardi Pin Copy link Aug 26, 2022 at 1:53 AM PDT  
[Reply](#) [Forward](#) [Delete](#)

**Safa Gelardi**  
 to Corey Weissman

Hi Corey, my website is not loading, I am having trouble getting into my website. Could it be you guys working on it? It's ok if it's you, I just want to make sure.

[1/1](#)

[View thread \(3\)](#) [4 associations](#)

**Email - GiantPartners Follow up- Thank you for your payment** from Corey Weissman Pin Copy link Aug 25, 2022 at 8:27 PM PDT  
[Reply](#) [Forward](#) [Delete](#)

**Corey Weissman**  
 to Safa Gelardi  
 1 Open 1 Close 0

Hi Safa:

We have received your first payment and thank you for making your 1st payment today. We are very confident in what we can achieve for you with our partnership together and we are looking forward to a long-term partnership with you!

One of our top account managers from our digital department will be reaching out tomorrow to send you the onboarding documents and set up the kick-off call for next week.

They will be one of your main points of contact regarding the digital side of our partnership, which includes getting approval on content, etc.

I will always be a part of this partnership and I will be responsible for pulling the data of who we are targeting and help you with any data lists you want to download. I will also always be here to answer your calls and help you as well.

We will discuss this more in-depth on our kick-off call and I am very excited to get the call scheduled ASAP!

If I don't talk to you tomorrow, I hope you have an amazing weekend and I look forward to seeing you in the kick-off call next week!

All my best,

Corey  
**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
 Office: (805) 247-1375 ext 126  
 Direct: (805) 871-0425

 [Connect on LinkedIn](#)

[1/1](#) [4 associations](#)

**Email - GiantPartners/ListGiant Follow up- Partnership Link Inside** from Corey Weissman Pin Copy link Aug 25, 2022 at 11:47 AM PDT  
[Reply](#) [Forward](#) [Delete](#)

**Corey Weissman**  
 to Safa Gelardi  
 1 Open 4 Close 0

Hi Safa,

It was a pleasure speaking with you this morning and here is the link to create your password, view and approve the partnership and submit your 1st payment.

As soon as the payment is received, one of our Account Managers from our digital team will be sending you an onboarding document and also set up the kick-off call to go over all the details and get this partnership started ASAP!

**Safa Gelardi** ([safagelardi@gmail.com](mailto:safagelardi@gmail.com))  
 Safa Gelardi,

Click the link below to confirm your email address for your new [payment.giant.com](https://payment.giant.com) account.

<https://payment.giant.com/index/confirm?step=3&id=418344829054653040a0d871121>

Please let me know if you have any questions or concerns.

We are greatly looking forward to working with you long-term and building a long-term mutually beneficial relationship!

All my best,

Corey  
**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
 Office: (805) 247-1375 ext 126  
 Direct: (805) 871-0425

 [Connect on LinkedIn](#)

[1/1](#) [4 associations](#)

**Email - Giant Partners JME Companions Partnership Details** from Jeremy Koeng Pin Copy link Aug 24, 2022 at 12:43 PM PDT  
[Reply all](#) [Reply](#) [Forward](#) [Delete](#)

**Jeremy Koeng**  
 to Safa Gelardi, [eugene@jmeconsulting.com](mailto:eugene@jmeconsulting.com), Corey Weissman

Tracking data is not available for this email. Jeremy Koeng chose to log this email but not track it. [Learn more](#)

Safa and Eugene,

Thank you for jumping on the screen share to discuss the **JME Companions Strategic Overview**. See relevant links below:

**Proposal:** <https://giantpartners.com/jmeccompanions092422.pdf> (Refresh browser to updates based on our discussion)

**Video Presentation**  
 (Raw video recording of the entire presentation and discussion)

**Contract Preview**  
 (Shared Google doc you can insert your comments on)

**Next steps:** Let us know when you are ready to have a follow up discussion. To get started and we will write up the formal contract in our platform. After confirmation you will receive a link from Giant Partners to create your account, accept terms and conditions, and set up your payment.

We look forward to working with you.

**JEREMY KOENG**  
 Giant Partners  
 President of Digital Strategy  
[jeremy@giantpartners.com](mailto:jeremy@giantpartners.com)  
 (805) 247-4376 ext 158

 [7 associations](#)



✉ Email - Re: Invitation: GiantPartners & IMECompanion - Strategy Proposal @ Tue Aug 23, 2022 2pm - 3pm (EDT) (sfofelard@gmail.com) from Corey Weissman Pin Copy link Aug 23, 2022 at 10:27 AM PST  
Reply Forward Delete

**Corey Weissman**  
to sfofelard@gmail.com  
Open: 0 Close: 0


Hi Safa,

No problem at all, just re-sent the invite for tomorrow at the same time!

We are very excited to present to you and build a long-term mutually beneficial relationship!

All my best,

Corey  
**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (805) 267-1375 ext 126  
Direct: (805) 871-0423

  
Connect on LinkedIn

On Tue, Aug 23, 2022 at 9:04 AM Safa Gelardi <sfofelard@gmail.com> wrote:  
Hi Corey,  
Today's zoom will not work for me. Can we do tomorrow same time

On Fri, Aug 19, 2022 at 1:35 PM <corey@giantpartners.com> wrote:

[Join with Google Meet](#)

**Meeting link**  
meet.google.com/fgt-jury-ajp

**Join by phone**  
(US) +1 316-247-4479  
PIN: 901012572

[More phone numbers](#)

**When**  
Tuesday Aug 23, 2022 - 2pm - 3pm (Eastern Time - New York)

**Guests**  
corey@giantpartners.com - organizer  
sfofelard@gmail.com  
jeremy@giantpartners.com  
[View all guest info](#)

**Reply to:** sfofelard@gmail.com  
Yes No Maybe More options

Invitation from Google Calendar  
We are reposting this email because you are subscribed to calendar notifications. To stop receiving these emails, go to [Calendar settings](#), select this calendar, and change "Other notifications".  
Forwarding this invitation could allow any recipient to send a response to the organizer. For advice on the guest list, please review responses of their own invitation status, or modify your RSVP. [Learn more](#)

4 associations

✉ Email - GiantPartners/ListGiant- Follow up- Thank you for your recent inquiry regarding Data & Digital Marketing Services from Corey Weissman Pin Copy link Aug 18, 2022 at 12:41 PM PST  
Reply Forward Delete

**Corey Weissman**  
to sfofelard@gmail.com  
Open: 0 Close: 0

Hi Safa,

It was a pleasure speaking with you today in regards to helping you reach the growth and goals for [IMECompanion.com](#).

I sent the invite for the discovery call tomorrow at 10 am PST/3pm EST to go over any and all questions before we put together the strategy presentation and present it to you early next week.

Link to Discovery call 8/19/22 at 10 am PST:

Meeting Link: [meet.google.com/nh-wjry-qvu](#)

Phone Link: [Join by phone](#)  
(US) +1 415-905-0443 PIN: 810 110 5748

We can definitely help you with this request as we are a 20 year old full service data and digital marketing company. We own all of our data in-house and we have over 280 million consumers and over 28 million businesses with all the demographic and psychographic data you can imagine. We are also a full service digital marketing agency and we do the marketing for start-up companies to Fortune 500 companies such as BMW, Ferrari, QuickenLoans, Ethos&Allen and many more. It is all about a long-term mutually beneficial relationship for us!

We offer 3 different tiers of solutions based on our clients needs. We also have the 5 tiers listed on our website here: <https://giantpartners.com/pricing/>

---

**Tier 1: Targeted Data Lists:** This would be a 1 time purchase and depending on whether you want Business/Consumer data and depending on the contact information the minimum order ranges from \$500-\$1,000. The more data you purchase the better rate per record we can provide.

**Tier 2: A La Carte Packages:** This is where clients hire us for a 30 day period approx. to do either an email, social or google campaign. This also includes content creation, website development and more. The prices range from \$2,500-\$5,500 approx depending on which package you're interested in. This tier is more for an event you need to promote or something short-term.

**Tier 3: Data Driven Digital Marketing Partnerships:** This is where companies hire us to do their marketing. For the cost of 3 very skilled full-time Marketing Professionals, you get a team of 50+ people working on your marketing. It's an invaluable offer and this includes us creating content, marketing across email, social, google, optimizing your website, and much more. The monthly cost for our custom Data Driven Digital Marketing Partnerships are between \$5,000-\$10,000/month and that does not include your ad spend. We also do not charge you our monthly fee on the 2nd month which Jeremy will explain more on our presentation call.

If you are interested in this option, the next step would be to set up a discovery call with you and anyone from your team you feel should join the call and myself and our President of Digital Strategy, Jeremy Koenig. (Which we did for tomorrow at 10 am PST/3 pm EST.)

After the discovery call Jeremy will take his notes to our Digital team and we will put together a custom proposal for [IMECompanion.com](#) that is detailed and has a timeline of what we will be providing you with and accomplishing every month. There is no obligation to do the discovery call or review the strategy at all.

---


With all of that being said, we are greatly looking forward to becoming a long-term resource for you and your team at [IMECompanion.com](#) and building a long-term mutually beneficial relationship!

Please let me know your thoughts and if you have any questions or consent.

We look forward to speaking with you tomorrow.

All my best,

Corey  
**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (805) 267-1375 ext 126  
Direct: (805) 871-0423

  
Connect on LinkedIn

4 associations

This contact was created from Offline Sources from CRM UI Aug 18, 2022 at 12:04 PM PST

Switch to the refreshed navigation [Learn](#)

Collect insights with your CRM

Search HubSpot

Contacts Conversations Marketing Sales Commerce Service Automation Reporting Template Marketplace Partner

Contacts

**Safa Gelardj**  
IME Companions  
sgelardj@imecompanions.com

Note Email Call Task Meeting More

About this contact

Contact owner: **Conor McDaniel**

First name: Safa

Last name: Gelardj

Company name: IME Companions

Website URL: <http://www.imecompanions.com>

Industry (Select)

Industry (Description)

LinkedIn URL

Job title

Email: [sgelardj@imecompanions.com](mailto:sgelardj@imecompanions.com)

Phone number

Extension

Mobile phone number

Status

Contact person

Overview Activities

Search activities

Activity Notes Emails Calls Tasks Meetings

Filter by: Filter activity (1/39) All users All teams

March 2024

**Email - GiantPartners Follow up- New Agreement** from Corey Weissman

**Corey Weissman**  
To: [sgelardj@imecompanions.com](mailto:sgelardj@imecompanions.com), IME Legal Reps, Safa Gelardj, Safa Gelardj  
Opens: 4 Clicks: 0

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.


I would like to schedule a call with you and Safa and Jeremy and myself so we can discuss what you guys need and that way we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again soon.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners, Database Marketing Advisor  
Call: (805) 267-1375 ext 126  
Text: (805) 625-9532  
Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)  
Calendar: [Book meeting](#)  
LinkedIn: [Connect](#)



associations

March 2023

**Email - GiantPartners Follow up- Checking in** from Corey Weissman

**Corey Weissman**  
To: Safa Gelardj  
Opens: 1 Clicks: 0

Hi Safa,

I hope all is well with you, I just wanted to check in with you and see how everything is going?

Per my notes from our last conversation we are going to continue sometime between May-June this year.


We look forward to continuing our partnership together and rebuilding momentum as soon as possible.

Let me know your thoughts and if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1375 ext 126  
Direct: (805) 871-0425



[Connect on LinkedIn](#)

association


February 2023

**Email - Fwd: GP - Lead Nurturing Flow** from Corey Weissman

**Corey Weissman**  
To: Safa Gelardj  
Opens: 15 Clicks: 0

Please see the email below:

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1375 ext 126  
Direct: (805) 871-0425



[Connect on LinkedIn](#)

View thread (4)

association

**Email - Re: GP - Lead Nurturing Flow** from Corey Weissman

**Corey Weissman**  
To: Safa Gelardj, Conor McDaniel, Tiffany Lefebvre  
Opens: 15 Clicks: 0

Hi Safa,

I hope all is well with you, below is the link of access to the data we are targeting across all channels.

In total we are targeting 53k+ throughout all platforms and approx. 8-10k via email.

Here is the google drive link:  
<https://drive.google.com/drive/folders/1L8F7mtZTL8gUgQfP7Xn3TsWIGSMk0>

Please let me know if you have any questions or need anything else!

All my best,


Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1375 ext 126  
Direct: (805) 871-0425

association

Companies (1)

Primary

**IME Companions**  
[imecompanions.com](http://imecompanions.com)   
+1 (800) 409-9921  
Last activity date: 05/20/2024 9:22 AM PDT

View associated companies

Deals (8)

**IME Companions: DG : 236416-6 : Recurring Business**  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

**IME Companions: DG : 236416-5 : Recurring Business**  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

**IME Companions: DG : 236416-4 : Recurring Business**  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

**IME Companions: DG : 236416-3 : Recurring Business**  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

**IME Companions: DG : 236416-2 : Recurring Business**  
Amount: \$12,250.00  
Stage: Won Opportunity  
Deal owner: Corey Weissman

Show more View associated deals

Attachments **new**

Add

See the files attached to your activities or uploaded to this record.

Contacts (0)

Add

See the people associated with this record.



[Connect on LinkedIn](#)

View thread (4)

3 associations

Email - GP - Lead Nurturing Flow from Conor McDaniel

Pin Copy Link Nov 8, 2022 at 8:55 AM PST



Conor McDaniel  
to Sofia Gelardi, Tiffany Laszlo, Corey Weissman

Reply all Reply Forward Delete

Opens: 15 Clicks: 0

Hey Sofia,

I hope all is well with you!

My team has brought to my attention that they would like to set up a lead-nurturing flow for you in order to increase contact rates with leads generated.

I'm going to have them move forward with this, at no additional cost to you. The team thoroughly enjoys working for IME Companions and wants to see more of these leads convert to more business for you.

We will reach out to you for guidance on copy. We will have this set up for you ASAP.

Thank you, Sofia!

Cheers,

CONOR MCDANIEL  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



View thread (4)

5 associations

November 2022

Email - GP - WP Login from Conor McDaniel

Pin Copy Link Nov 26, 2022 at 7:15 PM PST



Conor McDaniel  
to Sofia Gelardi

Text

URL: [www.imecompanions.com/wp-admin](http://www.imecompanions.com/wp-admin)  
Username: Conor  
Password: GPhonx12\*

Reply all Reply Forward Delete

Cheers,

CONOR MCDANIEL  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



View thread (4)

2 associations

Email - Re: Account Alert: Sofia Gelardi's given you account access. from Conor McDaniel

Pin Copy Link Nov 24, 2022 at 7:01 PM PST



Conor McDaniel  
to Sofia Gelardi, Tiffany Laszlo, Corey Weissman

Reply all Reply Forward Delete

Opens: 3 Clicks: 0

Hey Sofia,

We are creating a new user for you now - I will have this momentarily.

Cheers,

CONOR MCDANIEL  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



On Tue, Nov 29, 2022 at 2:06 PM Sofia Gelardi <[sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)> wrote:  
Tiffany, This is the same info I was using. I never changed the email, user name or password. You sent me the same credentials, I was using. Why can't I get in. I need to print out the work and assign for tomorrow. I need to get in. I can't even use last password option. Every email I entered is not working. Please. I need to get in

From: Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>  
Sent: Tuesday, November 29, 2022 4:55 PM  
To: Sofia Gelardi <[sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)>  
Cc: Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>  
Subject: Re: Account Alert: Sofia Gelardi's given you account access.

Hi Sofia,

Thank you for the updates.

Please see the link below for the website and the credentials that we have on the google drive document:

- <https://imecompanions.com/>
- [Credentials Form / Access to Client Website](#)

user Id - ICMMain  
Paswd - Success2019##

- PW: IMEGPlogin2023
- Hosting/Domain Service
- Username: [Info@imecompanions.com](mailto:Info@imecompanions.com)
- Password: Pupa05078

As for the TikTok account if it is not letting you log in with those credentials it may not have saved the account information as there was personal information missing. You'll need to use the information below to create a new account:

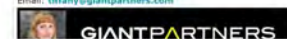
- TikTok (use info below)  
Username: IME Companions  
Email: [sofiagelardi@gmail.com](mailto:sofiagelardi@gmail.com)  
New PW: YH029208#  
Not ICM: [imecompanions.com](mailto:imecompanions.com)  
Not Password: Money5200  
Account creation link:  
<https://www.tiktok.com>

You will need to finish creating this on your end due to personal questions, DOB, phone, and a 2factor Authorization during the setup to prove it is your information. Also please provide feedback on the email sequences listed in the above email in the google drive folder.

Please let me know if you have any questions or issues accessing the website.

Best,

Tiffany Laszlo  
Giant Partners  
Account Manager  
Office: (805) 267-1575 x 160  
Text: (805) 626-3000  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



Connect on LinkedIn

On Tue, Nov 29, 2022 at 1:52 PM Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)> wrote:

Please help me get access to the web back end of my website. I am unable to log in. I need to log in to assign the work for tomorrow. Please let me know if there was a change in credentials from your end.

From: Tiffany Laxlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>

Sent: Tuesday, November 29, 2022 1:52 PM

To: Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)>

Cc: Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Subject: Re: Account Alert: Safa Gelardi's given you account access.

Thank you Safa,

We should have all the access we need for the website now, we just needed to update the URL link. We were also waiting on your TikTok account. If you could please make sure you can log in and have all the correct business and personal information set up that would be great. Please see the information below:

- TikTok (use info below)
- Username: IME Companions
- Email: [saforagelardi@gmail.com](mailto:saforagelardi@gmail.com)
- New PW: Vhs291288
- Not EM: [imecompanion.com](mailto:imecompanion.com)
- Not Password: Money201
- Account creation link: <https://www.tiktok.com>

You will need to finish creating this on your end due to personal questions, OGB, Phone, and a 2Factor Authorization during the setup to prove it is your information.

Please see the website and content linked below.

- <https://imecompanion.flywheelites.com/>
- Email Sequences

Looking forward to hearing from you soon.

Best,

**Tiffany Laxlo**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 828-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



Connect on LinkedIn

On Tue, Nov 29, 2022 at 7:36 AM Safa Gelardi via GoDaddy <[rdonoreply@godaddy.com](mailto:rdonoreply@godaddy.com)> wrote:



Need help? Contact  
Customer Number: 146835

## You now have access to Safa Gelardi's account.

**Accept Access** →

You need to accept within the next 48 hours. By doing so, you agree to the [Delegate Access Terms of Service](#).

Please do not reply to this email. Emails sent to this address will not be processed.

Copyright © 1999-2022 GoDaddy Operating Company, LLC. 1151 E. GoDaddy Way, Tempe, AZ 85294 USA. All rights reserved.

588855744

5 associations

✉ Email - Re: IME HubSpot Account Notifications from Conor McDaniel

Pin Copy Link Nov 3, 2022 at 4:37 PM PST



**Conor McDaniel**

To: Safa Gelardi, Tiffany Laxlo, Steve Page, Corey Weissman

Hi Safa,

Hey Safa,

Thank you for your time just now.

To recap, we will build a lead nurturing sequence for all new leads.

You had mentioned specific copy that you wanted in these emails. Can you send this over to us? Upon receipt, our copywriters will begin drafting up a 3 email sequence.

Thank you, Safa,

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

Connect on LinkedIn



On Wed, Nov 2, 2022 at 4:39 PM Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)> wrote:

Perfect thanks Tiffany

From: Tiffany Laxlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>

Sent: Wednesday, November 2, 2022 7:39 PM

To: Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)>

Cc: Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Steve Page <[stevep@giantpartners.com](mailto:stevep@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Subject: Re: IME HubSpot Account Notifications

Hi Safa,

Understood.

Sorry, I missed your call, my phone has not been working correctly for the past week or so. It's better if you call or text my Google voice number:

- (805) 828-3050.

I'll have the team work on these email templates for you. Once we have this ready I'll send it over for your review.

Best,

**Tiffany Laxlo**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 828-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



Connect on LinkedIn

On Wed, Nov 2, 2022 at 4:21 PM Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)> wrote:

Scratch that do not upgrade the hubspot, I will send the emails from my outlook. I just want a nice looking template where I can put in rates and a short paragraph on what the business is about

From: Tiffany Laxlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>

Sent: Wednesday, November 2, 2022 7:08 PM

To: Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)>

Cc: Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Steve Page <[stevep@giantpartners.com](mailto:stevep@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Subject: Re: IME HubSpot Account Notifications

Hi Safa,

Hope this email finds you well.

Our team got your message about the email automation and we have a few options for you before we can get that set up. We can upgrade your current Hubspot account or we can try to run these email





## Subject: IME Legal Reps



**IME Legal Reps** <imelegalreps@gmail.com>  
to Corey Weissman, Estefania Sedano

Tue, Mar 19, 2024, 12:58 PM

Hello, please help me restore the IME Legal Reps web page. my clients are not able to book. please help asap

Eugene

## Subject: IME Legal Reps - Updates



**Estefania Sedano** <estefania@giantpartners.com>

Tue, Apr 18, 2023, 10:05 AM

to Safa Gelardi, Conor McDaniel, Corey Weissman, Manuel Cabrera

You are viewing an attached message. IME Watchdog Mail can't verify the authenticity of attached messages.

Hey Safa,

Hope all is well!

I wanted to check in and send you an update on the work in progress - see below.

### Branding

- Currently, the logo and colors mockups are in Quality Control, once we have approval from Scott I will be sending these.

### Website transfer

- On Friday we moved the website development to the new domain: <https://imelegalreps.com/> and while waiting for the new branding approved and ready, we have removed any IME Companion logo or wording in the website.

### New Social & Paid Accounts

- In order to set up the new Social Media and Paid accounts (such as Google Ads and LinkedIn), there are a few ways to do it:
  - You can share the login information of the email you want to register all accounts.
  - Or we can schedule a meeting and do it together.

For the meeting, we can do

**Wednesday** at 10:00 am or 1:00 pm - 3:30 pm PDT

**Thursday** at 9:00 am - 1:00 pm PDT

Let me know what works for you!

Cheers,

**Estefania Sedano**

[Giant Partners](#)

Account Manager

(805) 262 7994 or

# GIANT PARTNERS

## KICKOFF CALL QUESTIONNAIRE

Q1: In your own words can you articulate your unique value proposition?

(What makes you different and superior to your competition)

We are nationwide (Only company nationwide)

There is no conflict of interest, we do not hire attorneys to advocate for your clients.

We NEVER turn down an IME Request. (Great Tagline)

We serve Supoenas if needed, we provide affidavits if needed, we can testify in court if needed

We are owner operated (Only one as of now), you will never be neglected, we are always reachable no matter what time or day (others are 9-5. They are 24/7). No matter what you are trying to reach us for whether it is for a report or last minute request, you will always be able to reach a decision maker

Although we are a third party, we consider ourselves an extension of the law firm, we represent our clients professionally

Our Companions are professionals, with careers in professional fields or came from professional fields.

Q2: In your own words, what are the top pain points that your product alleviates for customers?

Cheaper for attorneys, fee is a disbursement from the case. They just upfront the fee.



We serve as witnesses to dispute the biased doctors reports denying causation to the injury or the existence of an injury

We contact the client the day before to remind them of their appt. (a lot of times the client is unaware of their appt or forgot)

Uncertainty of whether the client attended, (they lie and say they did not show)

Uncertainty of what the client was asked to answer or do at the exam that may hurt the case

When your team is not available or calls out, IME Companions will always be there and reliable

(This is from Hurt911.com, it is a great tool for you to do research on the service)

While the doctors who perform the exams technically work for a company that is independent of the insurance company, there is substantial financial pressure on the hiring company which is passed on to the doctor performing the exam to please the insurance company by denying further treatment at an IME or to deny causation of the injury or the existence of the injury at a defense medical exam.

Some personal injury law firms allow clients to go to IME physicals alone which is a really bad idea. Most personal injury law firms will send someone, whether it be a lawyer, paralegal or another employee to accompany the client at the IME. Sending one of your employees is costly and much less effective than sending a trained representative from IME Companions. IME Companions representatives are well-trained and extremely effective at their job. Additionally, you'll get a written report of what happened at the physical.

Q3: Who are your primary competitors?

IME Watchdog,

IME Guards

Q4: What are your most high-performing call-to-actions for lead generation?

Super Lawyers - ideal audience - <https://www.superlawyers.com/>

CLE Meetings (NYSTLA, NYS academy of trial lawyers) there are associations in every state, they are all named something different)

Personal Injury Atty

Truck accident atty

Motorcycle attys

Construction Accidents (huge) they have the most need for us, their injuries are ususally very big and need to get the client the biggest settlement due to the client not being able to work again)

Hurt911 - ( <https://1800hurt911ga.com/>)

Q5: Where can we find examples of social proof that highlight your products/services?

(Examples: 1—Testimonials/Videos, 2—Customer Reviews, 3—Case Studies/Success Stories)

Email

IG/FB

Testimonials

Q6: What psychographic trends have you learned from your existing customer base?

(These buyer interests/associations help us to refine campaigns-based ad manager behavioral selects)

They all think the IME/DME are the defesne trying to minimize or dismiss their clients claim,

They know everything

They are very protective over their clients

Their mutual goal is to get the highest settlement

They believe the IME doctors are the devil

They are too busy to explain, there is no room for error

They will not accept apologies for errors, (they will go to the next company very fast)

They are paranoid and think their clients are being followed and will be integrated all the way to the IME

Q7: Who is the individual that will need to give approval for advertisements and communications before they go live? Safa Gelardi

Q8: Do you require any special contact fields for a lead to be passed into your CRM for the sales rep to follow? Need phone number and email

Do they use an IME service?

How much they pay?

Email & Phone

Contact person.

What they want in the reports?

Additional Instructions Needed:

Subject: Re: imelegalreps



**Conor McDaniel** <conor@giantpartners.com>  
to Corey Weissman, Jeremy Koenig

Wed, Apr 12, 2023, 1:06 PM

Received - thank you Corey.

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



On Tue, Apr 11, 2023 at 10:17AM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Conor,

Here are the credentials for the GoDaddy account for Safa at IME Legal Reps.

I just asked about the hosting and will let you know.

All my best,

Corey  
**COREY WEISSMAN**  
[Giant Partners](#)  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



[Connect on LinkedIn](#)

----- Forwarded message -----

From: **IME Legal Reps** <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)>  
Date: Tue, Apr 11, 2023 at 10:14AM  
Subject: Re: imelegalreps  
To: Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Godaddy acct  
[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com) / 567675340 customer number  
paswd - Levicunt62

On Tue, Apr 11, 2023 at 10:59AM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:  
Good morning Safa!

I hope all is well with you, are you planning on securing the agreement today so we can get going on the website?

Please let me know if you have any questions.

All my best,

Corey  
**COREY WEISSMAN**  
[Giant Partners](#)  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



[Connect on LinkedIn](#)

On Mon, Apr 10, 2023 at 2:16 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Safa,

Here is the link to the new agreement, same details just new company, and us helping you build the new website.

Please let me know if you have any questions:

**Eugene Liddy** (IMELegalReps@Gmail.com)  
Eugene Liddy,

Click the link below to confirm your email address for your new PaymentGiant.com account.

[https://paymentgiant.com/index/confirm/key/  
5d305c3319670e4c6983114763847a49](https://paymentgiant.com/index/confirm/key/5d305c3319670e4c6983114763847a49)

We are greatly looking forward to working with you again!

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

On Mon, Apr 10, 2023 at 12:59 PM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

[info@imelegalreps.com](mailto:info@imelegalreps.com)

1800-409-9921

205 Charleston Lane

Fate Texas 75189

# LinkedIn Messaging Guide

## Invitation Message

- A short message (300 characters) requesting to connect. You can opt to have an organic message for connecting or direct message why you want to connect with them.
- You can put a personal touch by including their first name and business/company name
- The shorter and generic, the better

1. Hi Name, I'm looking to expand my network with lawyers who are motivated and passionate with what they do like yourself. Would you be open to connecting?  
Best, Safa
2. Hi Name, I am \_\_\_\_\_ of IME Companions, I'm looking to expand my network with legal executives like yourself. Would you be open to connecting? Best,  
Name.

## Welcome Messages

- Aims to build a connection and trust between the prospect and you by simply engaging them in a conversation where it will lead them into knowing more of what your company can do for them.

It can be as simple as "Thank you for accepting my invitation to connect, how are you doing?" or as engaging as asking a couple of questions which will direct us to sending the direct information about the website on the follow up message or reply.

1.

Hi Name,

Thank you for accepting my invitation to connect and be part of your professional network.

I wanted to reach out and share how we can help you deal with your clientele's lawsuit.

IME Companions is a group of caring, ethical, proud and trained professionals who will oversee and document the Insurance Medical Exam to protect you from dishonest doctors who perform these exams. Too often, patients are wrongfully denied benefits due to inaccurate reports written by these doctors.

We will do the best job with the highest integrity and we are proud to protect your client.

Please let me know if this is something you would be interested in, I'd be happy to jump on a quick call to discuss.

Best regards,  
Safa

2.

Hi Name,

Thank you for accepting my invitation to connect.

As a Legal Executive, I know how things can be difficult when an injury lawsuit faces any unfairness from IME doctors that sometimes never look at the patient or barely examine them. The false and misleading IME reports purchased by insurance carriers can have a devastating effect upon injured workers and accident victims seeking justice.

That's why we're here to provide a much-needed service in the legal industry - we oversee and document the Insurance Medical Exam to protect patients who are seeking justice after an accident.



Would you be interested in learning more about what we do? I would be happy to answer any questions you may have.

Best regards,  
You\_Name

**3. This approach is more of trying to initiate an open ended conversation with the lead.**

Hi Name,

Thank you for accepting my invitation to connect and allowing me to join your professional network.

As a legal executive representing (type of attorney) clients.

I wanted to reach out and ask how you deal with IME claims for your clients that are dealing with unfairness from IME doctors that sometimes never look at the patient properly or barely examine them.

I look forward to your response.

Best regards,  
Your\_Name

**FOLLOW UP MESSAGE - This will depend on the response from the lead.**

**1.**

Hi Name,

As a lawyer, you know that an insurance medical exam can have a huge impact on your case. The IME Companions team of caring and trained professionals will oversee and

document the examination to protect your interests and ensure that a fair report is written.

We are the best at what we do, we stand by our professionalism and We NEVER turn down an IME Request.

Here are some of the clients we've worked with and their feedback towards IME Companions.

<https://imecompanions.com/firms/>

If these services are something you'd be interested in, would you be open to jump on a quick call anytime this week or next week to discuss?

Looking forward to your response.

Best regards,  
Your\_Name

**2.**

Hi Name,

I just wanted to circle back and see if you were interested in learning how IME Companions can help you stand against the wrong and dishonest reports written by doctors who perform IME exams.

IME Companions was created to take a stand against these dishonest doctors and we never allow your client to do any invasive testing. We are a group of caring and trained professionals who will oversee and document the IME exam to protect your interests.

Here are some of the clients we've worked with and their feedback towards IME Companions.

<https://imecompanions.com/firms/>

Know that We NEVER turn down an IME Request.

If this is something you'd be interested in, I would be happy to send a calendar invite to jump on a quick call to further discuss.

Looking forward to your response.

Best regards,  
Safa

## **FINAL FOLLOW UP**

Hello again, Name.

Reaching out to you one last time to discuss how IME Companions provides assistance with your injury cases.

We understand that it can be difficult to find time to accompany clients to the IME Exam. That's why we offer this service, so you can focus on other important tasks. We have a team of professionals who are available 24/7 to accompany your clients to the IME Exam.

In addition, we take HD video recordings of Workers' Compensation IMEs so you can have evidence if something goes wrong. We also prepare a report describing exactly what took place during the examination, how long the examination lasted, and any errors or lapses made by the examining physician.

I would love to know if this is something you are interested in.

I look forward to hearing from you. If I don't hear from you in the next couple of days, I'll assume that you're not interested and I would definitely understand.

Best regards,  
Safa

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** Re: GiantPartners Follow up Marketing Efforts

**Date:** June 9, 2023 at 11:50

**To:** Safa Gelardi safagelardi@gmail.com, IME Legal Reps imelegalreps@gmail.com, 4536250@bcc.hubspot.com

**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Eugene and Safa,

I hope all is well with you both, I wanted to see if you could please update us regarding the marketing efforts for IME Legal Reps?

Our team is awaiting an update from you since we started updating your website back in April.

If either of you could please update us that would be greatly appreciated.

Let me know if you have any questions or concerns!

All my best,

Corey

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

On Thu, Jun 8, 2023 at 2:07 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Eugene and Safa!

I hope all is well with you both, unfortunately I haven't been able to get a hold of either of you!

I wanted to check in regarding the court date in May that you mentioned you wanted to wait until that was over to begin the marketing efforts.

I have our team asking what is going on with this partnership.

Could either one of you please update me regarding when we can start marketing?

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

## Subject: Re:



**Estefania Sedano** <estefania@giantpartners.com>  
to IME Legal Reps, Conor McDaniel, Dan Millet, Corey Weissman

Tue, Apr 25, 2023, 1:

Hey Eugene,

Thank you so much for the video!

The team proceeded to log in to [imecompanions.com](https://imecompanions.com) hosting and remove the IP so doesn't point to [imelegalreps.com](https://imelegalreps.com) any other website. The change can take up to two hours to reflect the changes.

Cheers,

**Estefania Sedano**

[Giant Partners](https://giantpartners.com)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Tue, Apr 25, 2023 at 9:43AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

[imelegalreps.com](https://imelegalreps.com) should not be linked to any other website. i do not want to be linked to any other website

On Tue, Apr 25, 2023 at 10:19AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

i hope you understand that we may lose a major client today because of this, this has to be fixed.

On Tue, Apr 25, 2023 at 10:17AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

---

Download Attachment

Available until May 25, 2023



**Corey Weissman** <corey@giantpartners.com>  
to Safa Gelardi, IME Legal Reps, 4536250@bcc.hubspot.com

Fri, Jun 9, 2023, 1

Hi Eugene and Safa,

I hope all is well with you both, I wanted to see if you could please update us regarding the marketing efforts for IV Legal Reps?

Our team is awaiting an update from you since we started updating your website back in April.

If either of you could please update us that would be greatly appreciated.

Let me know if you have any questions or concerns!

All my best,

Corey

**COREY WEISSMAN**  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
(805) 267-1575 ext 126  
[Schedule meeting](#)

On Thu, Jun 8, 2023 at 2:07 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Eugene and Safa!

I hope all is well with you both, unfortunately I haven't been able to get a hold of either of you!

I wanted to check in regarding the court date in May that you mentioned you wanted to wait until that was over to the marketing efforts.

I have our team asking what is going on with this partnership.

Could either one of you please update me regarding when we can start marketing?

All my best,

Corey

**COREY WEISSMAN**

## Subject: Re: GP - IME Legal Reps



**Conor McDaniel** <conor@giantpartners.com>  
to IME Legal Reps

Tue, Apr 25, 2023, 1

Thank you, Safa - I will reach out in a couple minutes to confirm we are in.

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)



On Tue, Apr 25, 2023 at 8:25AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

see credentials

Safa1125

Pupa0507!!

On Tue, Apr 25, 2023 at 11:08AM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

On my way into the office now - I see Estefania is working with you and Eugene on it now.

If there is an issue with the imecompanions domain, we will need access to the domain registrar (ex. GoDadd [imecompanions.com](https://www.godaddy.com) is in.

Can you send those login credentials over to Estefania?

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

## Subject: Re: GP - IME Legal Reps



**Conor McDaniel** <conor@giantpartners.com>  
to IME Legal Reps

Tue, Apr 25, 2023, 1

Thank you, Safa - I will reach out in a couple minutes to confirm we are in.

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)



**GIANTPARTNERS**

On Tue, Apr 25, 2023 at 8:25AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

see credentials

Safa1125

Pupa0507!!

On Tue, Apr 25, 2023 at 11:08AM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

On my way into the office now - I see Estefania is working with you and Eugene on it now.

If there is an issue with the imecompanions domain, we will need access to the domain registrar (ex. GoDadd [imecompanions.com](https://www.godaddy.com) is in.

Can you send those login credentials over to Estefania?

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)



## Subject: Re: IME Legal Reps - Branding Hand Off



**Estefania Sedano** <estefania@giantpartners.com>  
to IME Legal Reps, Conor McDaniel, Corey Weissman, Dan Millet

Tue, Apr 25, 2023, 11

Hey Eugene!

I see, can you please share a screen video to see the issue?

Thank you so much.

On Tue 25 Apr 2023 at 9:11 IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

why would it go to [imelegalreps.com](http://imelegalreps.com) they should not be affiliated. it should be like a brand new site

On Tue, Apr 25, 2023 at 10:09AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

this is a legal matter fix this now

On Tue, Apr 25, 2023 at 10:08AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

try another computer, it happens clients are seeing it, you are doing something wrong. i can not work witty a company like this

On Tue, Apr 25, 2023 at 10:06AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Eugene!

I checked the domain [imecompanions.com](http://imecompanions.com) and it doesn't redirect to the new site. Most likely you and this person need to clean cookies and captcha - some browser, like Chrome, tend to stored users' informatior screenshot below.



## Subject: Re: IME Legal Reps - Website Review



**Scott Owen** <[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)>  
to Sheldon Katz, Corey Weissman

Tue, Jun 27, 2023, 1

Sure thing.

**SCOTT OWEN**

[Giant Partners](#)

Creative Director

(805) 267-1575 ext 124

[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)



**GIANTPARTNERS**

On Jun 27, 2023, at 4:54 PM, Sheldon Katz <[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)> wrote:

Yes, please. Can you also cc Corey?

Thank you very much!

**SHELDON KATZ**

COO

[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)

**Office:** (805) 267-1575

**LinkedIn:** [Let's Connect](#)

---

**From:** Scott Owen <[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)>

**Sent:** Tuesday, June 27, 2023 2:40 PM

**To:** Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>; Sheldon Katz  
<[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)>

**Subject:** Re: IME Legal Reps - Website Review

I like it. Shall I send?

Sent from my iPhone

## Subject: Re: IME Legal Reps - Website Review



**Scott Owen** <[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)>  
to Sheldon Katz, Corey Weissman

Tue, Jun 27, 2023, 1

Sure thing.

**SCOTT OWEN**

[Giant Partners](#)

Creative Director

(805) 267-1575 ext 124

[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)



On Jun 27, 2023, at 4:54 PM, Sheldon Katz <[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)> wrote:

Yes, please. Can you also cc Corey?

Thank you very much!

**SHELDON KATZ**

COO

[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)

**Office:** (805) 267-1575

**LinkedIn:** [Let's Connect](#)

---

**From:** Scott Owen <[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)>

**Sent:** Tuesday, June 27, 2023 2:40 PM

**To:** Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>; Sheldon Katz  
<[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)>

**Subject:** Re: IME Legal Reps - Website Review

I like it. Shall I send?

Sent from my iPhone

Subject: Re: imelegalreps



**Conor McDaniel** <conor@giantpartners.com>  
to Corey Weissman, Jeremy Koenig

Wed, Apr 12, 2023, 1:06 PM

You are viewing an attached message. IME Watchdog Mail can't verify the authenticity of attached messages.

Received - thank you Corey.

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)



On Tue, Apr 11, 2023 at 10:17AM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Conor,

Here are the credentials for the GoDaddy account for Safa at IME Legal Reps.

I just asked about the hosting and will let you know.

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

----- Forwarded message -----

From: **IME Legal Reps** <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)>  
Date: Tue, Apr 11, 2023 at 10:14AM  
Subject: Re: imelegalreps  
To: Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Godaddy acct  
[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com) / 567675340 customer number  
paswd - Levicunt62

On Tue, Apr 11, 2023 at 10:59AM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:  
Good morning Safa!

I hope all is well with you, are you planning on securing the agreement today so we can get going on the website?

Please let me know if you have any questions.

All my best,

Corey  
**COREY WEISSMAN**  
[Giant Partners](#)  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-0425



[Connect on LinkedIn](#)

On Mon, Apr 10, 2023 at 2:16 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:  
Hi Safa,

Here is the link to the new agreement, same details just new company, and us helping you build the new website.

Please let me know if you have any questions:

**Eugene Liddy** (IMELegalReps@Gmail.com)  
Eugene Liddy,

Click the link below to confirm your email address for your new PaymentGiant.com account.

[https://paymentgiant.com/index/confirm/key/  
5d305c3319670e4c6983114763847a49](https://paymentgiant.com/index/confirm/key/5d305c3319670e4c6983114763847a49)

We are greatly looking forward to working with you again!

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

On Mon, Apr 10, 2023 at 12:59 PM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

[info@imelegalreps.com](mailto:info@imelegalreps.com)

1800-409-9921

205 Charleston Lane

Fate Texas 75189

## Subject: Re: Website



**Corey Weissman** <corey@giantpartners.com>  
to IME Legal Reps

Thu, Mar 28, 1:

Hi Eugene,

I hope all is well with you, I wanted to check in and see if you resolved your website issue? Do you need any addit help from us?

We hope to hear from you soon and work with you and Safa again.

All my best,

Corey

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#).

On Wed, Mar 20, 2024 at 9:19AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

HI Corey, anyway you can charge me for just restoring the site

Eugene

# EXHIBIT B



**From:** Scott Owen scottowen@giantpartners.com   
**Subject:** GIANT PARTNERS - PARTNERSHIP - FOLLOW UP  
**Date:** June 27, 2023 at 17:59  
**To:** imelegalreps@gmail.com  
**Cc:** Corey Weissman corey@giantpartners.com

SO

Hello Eugene,

I hope you are doing well. I wanted to address your recent email regarding the cancellation of your contract after the first month.

As per the terms and conditions outlined in the contract, which we mutually agreed upon, the duration of the agreement is for 12 months, with an option to opt-out after four months. We understand that circumstances can change, and we value open communication with our clients. However, it is essential to note that we have tried to reach out to you by phone since we got your email, but unfortunately, we haven't been able to connect. We believe that discussing your concerns directly will allow us to explore possible solutions and ensure your satisfaction.

We genuinely value our partnership and are committed to finding a resolution that meets your needs. Please spare some time for a brief conversation to discuss the situation further.

Please let me know your availability for a call, and I will make sure a suitable time is scheduled to address your concerns as soon as possible.

Thank you for your attention to this matter, and I look forward to speaking with you soon.

Best regards,  
**SCOTT OWEN**

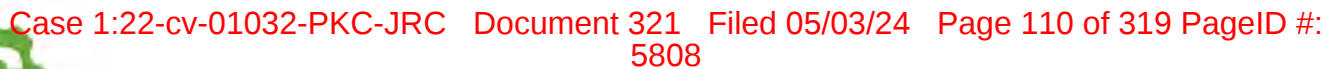
[Giant Partners](#)

Creative Director

(805) 267-1575 ext 124

[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)





Dear Mr. Scura, following up on our communication about using our services. I would love to secure your business, please let me know if you have any questions or concerns.

## Advantages of Using an IME Companions

- Well-trained professionals who are extremely effective at their job. They also appear at exams multiple times per day, so they get good at what they do.
- Prevents clients from answering inappropriate questions and being deposed.
- Prevents clients from undergoing unauthorized tests such as X-rays or MRIs.
- You'll get a written report of the start and end times of the physical, what happened at the physical exam, what was said at the physical, tests conducted, tests omitted, errors, and how the client performed.
- Companions can testify in court about what happened at the physical exam.
- Prevents clients from being approached by unscrupulous personal injury lawyers looking to grab your case.
- IME Companions can act as a translator.

We also covered audiology exams across the country for the 3M class action lawsuit.  
<https://www.prnewswire.com/news-releases/ime-companions-is-providing-legal-advocates-for-law-firms-to-help-veterans-in-the-3m-combat-arms-earplug-class-action-lawsuit-301490598.html>

When you hire us, you can expect that we will conscientiously and diligently perform the following:

Interview you to determine your needs for the exam.

Call your client 24 hours before the IME to make sure he/she will be attending and provide directions, if necessary.

Meet your client at the location of the IME 15 min before their scheduled appointment

Observe the examination and take detailed notes of the intake questions and answers, the type of tests the doctor conducts, the plaintiff's performance during those tests, the length of the examination, and any other relevant points during the exam

We also ensure that your client does not permit the doctor to perform any unauthorized tests such as X-rays or MRI's.

Provide a brief profile of the examining doctor.

E-mail you, within 5 business days, a detailed report including all of our notes and observations.

We stay in full communication with you and your office, we notify you and your office of any long waits or anything out of the ordinary.

The IME Companion professional who attends the IME will also be available to submit an affidavit in support of your opposition to defendants' motion for summary judgment and testify at trial.

The rates are, 175 first hour and 45 each additional half hour.

Kind Regards,

Safa Gelardi  
Chief Executive Officer

Office: 833-463-7767  
Direct: 718-749-4732  
9207 245<sup>th</sup> St  
Floral Park, New York 11001  
Email: [sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)  
[www.imecompanions.com](http://www.imecompanions.com)



<b>CORE Order #</b>	238416
<b>CORE Partner</b>	GIANT PARTNERS
<b>CORE List Advisor</b>	Corey Weissman
<b>Client</b>	IME Companions
<b>Client Contact</b>	Safa Gelardi
<b>Date</b>	August 25, 2022

# GIANT PARTNERS

1461 Lawrence Drive  
Thousand Oaks, CA 91320  
P: (805) 267-1575

Order No238  
Order  
Amount \$[a  
Date Au  
25,  
Terms Rec  
CompanyCon  
Contact We

Ship to

**IME Companions**  
Safa Gelardi  
148 Clay Pit Road  
Staten Island, NY 10309  
P: (718) 749-4732

**IME Companions**  
Safa Gelardi  
148 Clay Pit Road  
Staten Island, NY 10309

## Line Item Description

Item	Description	Amount
Digital Marketing Partnership	12 Month Term	7250

#### DATA SUBSCRIPTION (TX, NY, PA, NJ, NY—SELECT MSA)

- > Persona 1 (B2B): Personal Injury Law Firms
- > Persona 2 (B2B): Workers Comp Law Firms
- > Affiliate lead management support (purchasing and integrations) (Option)
- > Data Appending (Up to 10K records once per month—Up to 5 selects)
- > Data Modeling (Lookalike audience creation and analysis)

Available formats: Email Marketing\*, Social Media Advertising\*\*, Web Search Advertising\*\*, Telemarketing\*\*\*, Direct Mail\*\*\*. Databases updated monthly.

\*B2C/B2B email outreach ramp (Up to 25K emails targeted per month—2 sends).

\*\*Custom audience lists uploaded directly into customer ad manager.

\*\*\*Up to 25K records available upon request per month.

#### DIGITAL MARKETING SERVICES

> Facebook, Instagram, LinkedIn Advertising and Retargeting (Blend based on performance—Ad spend managed to ensure optimal CPM,CPL,CPA)

> Google (PPC, Display) and YouTube Advertising and Retargeting (Blend based on performance—Ad spend managed to ensure optimal CPM,CPL,CPA)

Includes: Platform support, Ad manager configuration, ChatBot configuration (option), audience/keyword discovery and strategy, ad design (video, image, text) and spend optimization. Customer retains ownership of advertising content, creatives and systems. Rough draft content provided by Customer. Max 3 rounds of revisions per ad campaign.

Ad Spend: Monthly ad spend scaled monthly based on CPM, CPL and CPA performance paid directly to Facebook, Google, Other and pre-approved by Customer. Minimum recommended ad spend 5K/month (National campaigns) or 2.5K/month (Local campaigns). Maximum ad spend 50K\*/month.

\*Ad spend management overages billed 10% fee at the end of each month. Ad spend overages require customer approval and signature.

#### EMAIL MARKETING

> Email marketing outreach via GP platform (Up to 25K\* emails targeted per month)

\* Overages: Email outreach overages will be billed at \$1,000 per 10,000 emails targeted at the end of each month. Email outreach overages require customer approval and signature.

Includes: Email validation. Warmed email sending domain. Deliverability optimization. Original source content and copy/scripts provided by Customer. Max 3 rounds of revisions per email campaign. Customer retains ownership of email marketing data (option) post inbox delivery. Customer does not retain ownership of cold email marketing platform.

#### CONTENT MARKETING

- > eBook Design Template
- > Webinar Design Template
- > eNewsletter Design Template

\*Specific content calendar TBD based on overall campaign performance. Examples: Infographic, Ebook, Webinar Slides, Online Calculator, Short PSA Style Video, Short Product Overview Video, Blog Article

Includes: Customer retains ownership of advertising content, creatives and systems. Each service above includes advertising design. Rough draft content provided by client for publishing.

#### MARKETING TECH

	Data and Digital Marketing Services subscription listed above represents a bundle of services that are included for a flat monthly management fee. Customer is not required to implement and or request any of the services listed above. Additional and supplemental work, requirements, and project scope require Giant Partners contract addendum with customer signature. Bundle of services can be adjusted mid partnership (same product value) based on strategic learnings from ongoing campaignâ€Requires customer approval via email confirmation.	
	<b>Total</b>	<b>7,250.00</b>



## Order History: 238416

Date	Status	User
August 25, 2022 11:39	New	Corey Weissman <corey@giantpartners.com>
August 25, 2022 11:44	Ready for Manager	Corey Weissman <corey@giantpartners.com>
August 25, 2022 11:45	Approved by Manager	Jeremy Koenig <jeremy@giantpartners.com>
August 25, 2022 11:45	Ready for Client	Jeremy Koenig <jeremy@giantpartners.com>
August 25, 2022 12:06	Approved by Client	Safa Gelardi <safagelardi@gmail.com>
August 25, 2022 12:06	Awaiting Payment	Safa Gelardi <safagelardi@gmail.com>
August 25, 2022 12:08	Ready for Processing	Safa Gelardi <safagelardi@gmail.com>
August 25, 2022 12:08	Processing	Safa Gelardi <safagelardi@gmail.com>
August 25, 2022 13:02	Complete	Juan Zendejas <juan@gcpartners.net>
September 27, 2022 16:23	Ready for Processing	Nicole Pinto <nicole@giantpartners.com>
September 27, 2022 16:23	Processing	Nicole Pinto <nicole@giantpartners.com>
September 27, 2022 17:55	Complete	Erica Barile <erica@rankgiant.com>
October 10, 2022 11:16	Processing	Conor McDaniel <conor@giantpartners.com>
October 10, 2022 11:19	Processing	Conor McDaniel <conor@giantpartners.com>
October 10, 2022 11:20	Processing	Conor McDaniel <conor@giantpartners.com>
October 10, 2022 11:42	Processing	Joe Crothers <joe@giantpartners.com>
October 10, 2022 11:42	Processing	Joe Crothers <joe@giantpartners.com>
October 10, 2022 11:43	Processing	Joe Crothers <joe@giantpartners.com>
October 12, 2022 11:29	Processing	Erica Barile <erica@rankgiant.com>
October 12, 2022 11:40	Processing	Erica Barile <erica@rankgiant.com>
October 17, 2022 12:29	Complete	Joe Crothers <joe@giantpartners.com>
October 19, 2022 08:24	Processing	Conor McDaniel <conor@giantpartners.com>
October 19, 2022 09:39	Processing	Joe Crothers <joe@giantpartners.com>
October 19, 2022 09:50	Complete	Joe Crothers <joe@giantpartners.com>
October 25, 2022 15:33	Processing	Juan Zendejas <juan@gcpartners.net>
October 25, 2022 15:34	Complete	Juan Zendejas <juan@gcpartners.net>
October 26, 2022 08:29	Ready for Processing	Nicole Pinto <nicole@giantpartners.com>
October 26, 2022 08:29	Processing	Nicole Pinto <nicole@giantpartners.com>
October 26, 2022 08:54	Complete	Erica Barile <erica@rankgiant.com>
November 8, 2022 13:11	Processing	Erica Barile <erica@rankgiant.com>
November 8, 2022 13:11	Complete	Erica Barile <erica@rankgiant.com>
November 25, 2022 08:12	Ready for Processing	Nicole Pinto <nicole@giantpartners.com>
November 25, 2022 08:12	Processing	Nicole Pinto <nicole@giantpartners.com>
November 25, 2022 11:37	Complete	Juan Zendejas <juan@gcpartners.net>
December 27, 2022 10:07	Ready for Processing	Nicole Pinto <nicole@giantpartners.com>
December 27, 2022 10:07	Processing	Nicole Pinto <nicole@giantpartners.com>
December 27, 2022 10:21	Complete	Erica Barile <erica@rankgiant.com>
December 28, 2022 11:40	Processing	Erica Barile <erica@rankgiant.com>
December 28, 2022 11:40	Complete	Erica Barile <erica@rankgiant.com>
January 19, 2023 09:39	Processing	Conor McDaniel <conor@giantpartners.com>
January 19, 2023 09:45	Processing	Conor McDaniel <conor@giantpartners.com>
January 19, 2023 12:25	Processing	Joe Crothers <joe@giantpartners.com>
January 19, 2023 12:26	Processing	Joe Crothers <joe@giantpartners.com>
January 19, 2023 13:47	Processing	Erica Barile <erica@rankgiant.com>
January 25, 2023 08:15	Ready for Processing	Nicole Pinto <nicole@giantpartners.com>
January 25, 2023 08:15	Processing	Nicole Pinto <nicole@giantpartners.com>
January 26, 2023 12:00	Complete	Joe Crothers <joe@giantpartners.com>
January 26, 2023 12:28	Processing	Erica Barile <erica@rankgiant.com>
January 26, 2023 12:28	Complete	Erica Barile <erica@rankgiant.com>
January 26, 2023 12:41	Processing	Erica Barile <erica@rankgiant.com>
January 26, 2023 12:41	Complete	Erica Barile <erica@rankgiant.com>
February 3, 2023 09:28	Processing	Conor McDaniel <conor@giantpartners.com>
February 7, 2023 09:11	Processing	Joe Crothers <joe@giantpartners.com>
February 7, 2023 12:23	Processing	Conor McDaniel <conor@giantpartners.com>
February 7, 2023 13:02	Processing	Joe Crothers <joe@giantpartners.com>
February 14, 2023 10:08	Complete	Joe Crothers <joe@giantpartners.com>
February 14, 2023 12:39	Processing	Erica Barile <erica@rankgiant.com>
February 14, 2023 12:40	Complete	Erica Barile <erica@rankgiant.com>
February 14, 2023 13:18	Processing	Erica Barile <erica@rankgiant.com>

February 14, 2023 13:18	Complete	Erica Barile <erica@rankgiant.com>
February 14, 2023 13:23	Processing	Erica Barile <erica@rankgiant.com>
February 14, 2023 13:35	Processing	Erica Barile <erica@rankgiant.com>
February 14, 2023 13:41	Processing	Erica Barile <erica@rankgiant.com>
February 14, 2023 14:42	Complete	Erica Barile <erica@rankgiant.com>
February 14, 2023 14:51	Processing	Erica Barile <erica@rankgiant.com>
February 14, 2023 14:51	Complete	Erica Barile <erica@rankgiant.com>
February 14, 2023 14:57	Processing	Erica Barile <erica@rankgiant.com>
February 14, 2023 14:58	Complete	Erica Barile <erica@rankgiant.com>
April 12, 2023 16:37	Contract Cancelled	Jeremy Koenig <jeremy@giantpartners.com>

## Confirmation Input Data: 238416

Did We Get it Right?	
Yes, My Order is Correct	X
No, Please Contact Me	
Name	Safa Gelardi
TRANSACTIONAL META DATA	
Date	August 25, 22
USER ID	25456
USER EMAIL	safagelardi@gmail.com
IP ADDRESS	68.132.28.148
USERAGENT	Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/104.0.0.0 Safari/537.36
TIMESTAMP	2022-25-08GMT19:25:56236

## Payment Input Data: 238416

Name As It Appears on Card	
Address	
City	
State/Region/Province	
Zip/Postal Code	
Country	
Credit Card Number	
CVV	
Expiration Date	
Save CC for Future Orders	
I Accept the billing terms and conditions	X
Full Name	SAFA GELARDI
TRANSACTIONAL META DATA	
USER ID	25456
USER EMAIL	safagelardi@gmail.com
IP ADDRESS	68.132.28.148
USERAGENT	Mozilla/5.0 (Windows NT 10.0; Win64; x64) AppleWebKit/537.36 (KHTML, like Gecko) Chrome/104.0.0.0 Safari/537.36
TIMESTAMP	2022-25-08GMT19:08:00236
AVS Only Authorization Results	
Little ID	
Response	
Message	
Auth Code	
AVS Result	
Amount	
Authorization Results	
Little ID	821318060542744057
Response	000
Message	Approved
Auth Code	04700G
Amount	7250.00

**These Terms and Conditions supplement and are made a part of the Order Confirmation between Customer and Company as if fully set forth therein.**

**Order Confirmation.** Customer acknowledges and agrees that the Order Confirmation and these Terms and Conditions constitute the entire agreement (together, the "Agreement") between the parties regarding the data, records, lists and/or products described therein (the "Product") and supersede any and all agreements and understandings, oral and written, with respect to the subject matter hereof. No representation, warranty, promise, inducement or statement of intention has been made which is not embodied in these Terms and Conditions, the Order Confirmation, or any other document, and no party shall be bound by, or be liable for, any alleged representation, warranty, promise, inducement or statement of intention not embodied herein or therein. Furthermore, handwritten information on the Order Confirmation will NOT be deemed to be a part of the Agreement. Any additional terms will be in "Notes to Client" on Client's Order Confirmation.

**Use of Product and Lists.** Customer represents and warrants that: (a) he/she/it is a merchant as understood and defined in the Uniform Commercial Code of the State(s) in which it operates, (b) the Product rented hereunder is for one-time use only, (c) no record in the Product, including without limitation, names, addresses, emails, etc. will be retained or duplicated, and (d) it will not use any Product in connection with the promotion or sale of sexually explicit materials, drugs, alcohol products or publicly traded securities. Further, Customer is strictly prohibited from using source or origination information regarding any rented Product as part of Customer's telephonic presentation or printed mail piece, including without limitation, disclosing the name, identity or contact information of Company. **NO EXCEPTIONS.**

**Disclosure of Proprietary Data.** To the extent that either Company or Customer discloses proprietary data and information to the other pursuant to this Agreement, they each acknowledge and agree that: (a) the disclosing party claims and reserves all rights and benefits afforded proprietary information under law, (b) this Agreement and disclosure to the other does not effectuate any transfer of title or interest in or to any proprietary data or information of the disclosing party, and (c) the other party is granted only a limited right of use of such proprietary data and information as may be necessary for the performance of this Agreement.

**Payment of Product.** Unless expressly provided on the applicable Order Confirmation, Customer shall pay for all Product by credit card, ACH, or wire transfer in the amounts and at the times provided on the Order Confirmation. Customer hereby irrevocably authorizes Company to charge the credit card account that has been provided by Customer to Company. Recurring payments will be charged on the same day of month as first payment. If the billing day of month lands on a weekend or holiday the payment will be charged on the previous business day. Customer acknowledges and agrees that it has read and fully understands this Agreement and Cancellation Policy referenced herein. In the event Customer fails to timely pay the full contract price when due per the terms of the Order Confirmation, Company shall, in addition to the other rights and remedies set forth herein, have the right to exercise one or more of the following without further notice to Customer: (a) suspend Customer's access to its website created by Company, (b) remove any and all website content created by Company, (c) delete Customer's entire website containing intellectual properties created by Company, (d) replace Customer's website designed by Company with Customer's pre-existing website, and/or (e) terminate all work by Company for Customer in connection with any digital marketing program designed by Company, including without limitation, logos, landing pages, and email campaigns. In connection therewith, Company accepts no responsibility and shall have no liability for any reliance by Customer on the continued availability of any content or resources on Customer's website.

**Cancellation Policy.** Customer acknowledges that all Product orders received from Customer require Company to create a custom product for Customer. Accordingly, Customer agrees that: (a) no returns of Product or reimbursements therefore will be made; (b) Customer is responsible for the full payment of such custom order; and (c) such financial responsibility shall not be released due to any of: (i) Customer rejecting said order, (ii) refusing to accept shipment, (iii) stopping payment on its check, (iv) requesting its credit card company to charge back or reverse the transaction or (v) changing the nature of the order, etc.

**Company Representations and Warranties.** Company represents and warrants to Customer that:

- 1.any work or materials produced or provided pursuant to this Agreement: (i) shall be free from computer viruses introduced into the software as a result of the negligence or intentional acts of Company and that the software will be free of software traps, viruses, worms, or code (including any undisclosed disabling device or code ) which would interfere with the intended use of the software in accordance with the specifications or which destroy or alter Customer's data, files, or systems and (ii) shall not infringe upon or violate any patent, trademark, copyright, trade secret or any other intellectual property rights of any third party;
- 2.its work under this Agreement shall be of professional quality consistent with industry standards and expectations for work of a similar nature;
- 3.it has the right to enter into and perform its obligations under this Agreement and such performance will not breach any other agreement by which it is bound; and
- 4.Product delivered to Customer under this Agreement (or under any Order Confirmation) shall not be subject to any prior or conflicting rights of any third party of any nature whatsoever.

EXCEPT AS EXPRESSLY SET FORTH IN THIS AGREEMENT, COMPANY MAKES NO OTHER WARRANTIES, EXPRESS OR IMPLIED, WITH RESPECT TO THE PRODUCT AND SERVICES PROVIDED, INCLUDING ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

**Customer Representations and Warranties.** Customer represents and warrants to Company that:

- 1.it has the right to enter into and perform its obligations under this Agreement and such performance will not breach any other agreement by which it is bound;
- 2.it understands that Company is not affiliated with search engines including but not limited to Google, Yahoo, Bing, Ask and MSN and therefore, Company will not be held responsible for search engine policy, structure or algorithm changes;
- 3.Company has the right to use Customer's name, Customer's domain name, Customer's logo and Customer's keyword rankings on websites, case studies and other marketing materials;
- 4.if contacted by an existing customer or potential customer of Company, Customer will not disclose terms of this Agreement including but not limited to pricing, pricing structure, and agreement term;
- 5.it will not name or refer to Company in any of Customer's advertisements or promotional or marketing materials; and
- 6.it will use the Product and other goods and services of Company in full compliance with the law and industry best practices.

**Compliance with Applicable Laws.** Customer acknowledges and agrees that: (a) it is not relying any legal advice from Company in connection with the use of the Product and (b) all Product which Customer receives under the Order Confirmation shall be used only in strict compliance with all applicable Federal, State, and local laws, rules, regulations, and ordinances, including but not limited to, those concerning privacy, telephone solicitation, email solicitation, fax broadcasts and direct marketing, such as: (i) the Federal Fair Credit Reporting Act; (ii) the Gramm, Leach, Bliley Privacy Act; (iii) the Do-Not-Call Implementation Act of 2003; (iv) the Telephone Consumer Protection Act of 1991; (v) the Federal Trade Commission Act; (vi) the Children's Online Privacy Protection Act; (vii) the California Consumer Privacy Act, and (viii) similar privacy laws. Customer understands that any person violating such laws may be subject to civil and criminal penalties. Customer further acknowledges and agrees that it is Customer's sole responsibility to determine the applicability of any such laws, rules, regulations and ordinances.

**Disclaimer of Warranties.** Customer acknowledges and agrees that: (a) all Product and other goods and services are provided by Company on an "AS IS" basis, (b) no liability is assumed by Company for the accuracy, completeness, condition, suitability or performance of any Product and information provided hereunder, (c) output fields are subject to change without notice, (d) all representations and warranties, express or implied, relating to any such goods or services, including all warranties of merchantability and fitness for a particular purpose, their quality, their security, or their non-infringement are hereby disclaimed, (e) due to the fact that data products can be copied easily, no order will be returned or accepted for credit or otherwise, unless first approved in writing by Company, (f) although industry averages may be quoted by representatives from time to time, individual results vary, and thus, except as expressly provided in this Agreement, no guarantee whatsoever is given for any results from the use of Product sold or services provided, (g) Company will not be responsible for any records that are selected incorrectly and/or downloaded improperly by



Customer, (h) any and all records downloaded from the "Portal" (as hereunder defined) will be deducted from the amount of records purchased as set forth on the Order Confirmation, (i) Company will not be held liable for any records that are downloaded in error, (j) should at any time Customer does not completely understand how to use the Portal, Customer shall notify Company to seek supplemental training, and (k) the "Limitation of Liability" section set forth below shall govern the rights of the parties hereto.

**Limitation of Liability.** Customer agrees, understands, and expressly acknowledges that: (a) when Company rents Product to any person or entity including Customer, Company neither assumes nor accepts any responsibility of any kind for defects, deficiencies, mistakes, ambiguities or inaccuracies of any kind or effect with respect to Product rented pursuant hereto; and (b) while Company believes its information to be accurate, it does not, except as otherwise expressly provided in the Order Confirmation, warrant or guarantee any degree of accuracy of the Product rented, nor the outcome or results of any mailing or promotion or any other undertaking of Customer, and Company shall not be held liable in any manner with respect thereto. In all events, any liability hereunder or otherwise of Company and its representatives shall be limited to the amount paid by Customer for Product within the twelve (12) months preceding the event which gives rise to liability and no more. Customer acknowledges and agrees that Company shall not be liable for indirect, special, incidental or consequential damages (including, but not limited to, damages for loss of business, loss of profits or investment or the like) whether based on breach of contract, breach of warranty, tort (including negligence), product liability or otherwise, even if Company or its representatives have been advised of the possibility of such damages, and even if a remedy set forth herein is found to have failed of its essential purpose. The limitations of liability set forth herein are fundamental elements of the basis of the bargain between Company and Customer, and Customer acknowledges and agrees that Company would not, under any circumstances, provide its goods and services without such express limitations.

**Indemnification.** Customer agrees to defend, indemnify and hold harmless Company, its subsidiaries and affiliates, and their respective officers, directors, agents, and employees from and against any loss, damage, expense, or cost, including reasonable attorneys' fees arising out of or related to: (a) Customer's act or omission that constitutes a breach or an alleged breach, or the breach or alleged breach of any person or entity to whom Customer may sell Product (if permitted hereunder), of any covenant, duty, representation, or warranty of Customer under this Agreement and (b) any claim that Company's use of Customer's trademarks infringes on any trademark, trade name, service mark, copyright, license, intellectual property, or other proprietary right of any third party. Company shall not be liable to Customer, or to anyone who may claim any right, due to the parties' relationship, for any acts or omissions in the performance of said services on the part of Company or on the part of its agents, officers, directors or employees or assigns which result from the delivery of services made to Customer by Company and its agents, officers, directors, employees or assigns, unless said acts or omissions of Company or its agents, officers, directors, employees or assigns are due to gross negligence or willful misconduct. Customer agrees to reimburse Company, for all expenses, including reasonable attorneys' fees incurred, to enforce the terms and conditions of this Agreement, collect payments due hereunder, and defend against claims or actions by any person or entity arising from Customer's breach or alleged breach hereunder. These indemnification provisions shall survive the expiration or termination of this Agreement.

## **PORTAL**

**Portal Term, Blocks, and Subscriptions.** All Product rented hereunder may be used by Customer on a confidential basis for the shorter of: (a) the period set forth on the applicable Order Confirmation or (b) twelve (12) months from the date of rental to Customer (the "Term"). Without the prior written consent from Company (which may be granted or withheld at Company's sole discretion), Customer shall not: (i) re-rent any Product or otherwise permit any use of Product by or for the benefit of any party other than Customer; (ii) publish, distribute or permit disclosure of any Product, other than to employees and agents of Customer on a need-to-know basis for use in Customer's business; (iii) use or permit use of any Product for the purpose of compiling, enhancing, verifying, supplementing, adding to, or deleting from any mailing list, geographic or trade business directories, classified directories, classified advertising, or other compilation of information which is sold, rented, published, furnished or in any manner provided to a third party; (iv) use or permit use of Product for the generation of any statistical information which is sold, rented, published, furnished or in any manner provided to a third party; (v) use or permit use of any Product to prepare any comparison to other information databases, which is sold, rented, published, furnished or in any

manner provided to a third party; or (vi) use or permit use of any Product in connection with individual credit, employment or insurance applications.

**Portal Unused Records.** Customer understands that this Agreement expires at the end of the Term and any and all unused records that have not been downloaded will expire on said date. It is highly recommended that Customer use/download all records before the end of the Term as such records will not be available thereafter.

**Portal Expense Reimbursement.** For Product accessed on the "Portal" and "White Label Product" (each as defined below), Customer shall reimburse Company for Product that is accessed and has not been paid for pursuant to the Order Confirmation at the rate of 2.5 cents (\$0.025) per record to be billed when and as accessed and shall be paid by Customer within five (5) business days thereafter.

**Portal Delivery of Product.** Unless specified on the applicable Order Confirmation, during the Term, Company grants to Customer a non-exclusive, non-transferable license to access the Company's website portal (the "Portal") to run counts and access the Data as provided in this Agreement and any documentation related thereto. Customer expressly agrees that such access to the Portal is for the sole use of Customer and it will not assign, license, distribute, or otherwise transfer any of its rights under this Agreement to any other person, firm, corporation, or other organization without the prior written consent of Company which may be granted or withheld at Company's sole and unfettered discretion.

**Portal Cancellation.** If Customer elects to terminate this Agreement prior to expiration of the Term, Customer agrees to pay an early termination fee of fifty percent (50%) of the remaining balance due as set forth on the applicable Order Confirmation. Customer understands that except as specifically set forth in this Agreement, the Product and payments provided for herein are non-returnable and non-refundable.

**Portal White Label Use.** For orders of Product designated as "White Label" on the applicable Order Confirmation, Customer agrees to explain and direct to its clients how to access Product through the White Label platform. Customer agrees for itself and on behalf of its clients that they are fully versed on and agree to adhere to all current FTC, FCC, State and Local laws that pertain to the use of White Label Product. Customer is responsible for all data costs that are associated with Customer's White Label instance. In connection with the White Label portal, Company's identity shall remain confidential for goods and services rendered by Company that are rented by Customer to rebrand and sell as its own.

**Portal Uptime Guarantee.** Notwithstanding anything contrary contained in this Agreement, Company offers a service uptime guarantee for the Portal, which provides for a credit to Customer (as specified below) if, through the act or omission of Company, the total availability of Product falls below ninety-seven percent (97%), that is, access to Product through the Portal by Customer is guaranteed for at least 354 days per calendar year ("Uptime"). If Customer can demonstrate to Company's reasonable satisfaction that Company has failed to maintain the Uptime, Customer may contact Company and request a credit for that month proportional to the amount of downtime, to be applied towards the purchase of future goods and services. Credits cannot be redeemed for cash, credit card refunds, or data, and are exclusive of any applicable taxes. Notwithstanding anything contrary in this Uptime Guarantee section, the credit does not apply to service interruptions caused by: (a) periodic scheduled maintenance or repairs undertaken by Company from time to time; (b) downtime caused by Customer; (c) outages that do not limit manual data pulls (for example, interruptions that do not prevent Company from manually pulling requested data and delivering electronically); (d) suspension of Customer's account due to legal action taken or threatened against Customer or Customer's services; (e) suspension of Customer's account due to violations of the T&C or DNC, as determined by Company in its sole discretion, including but not limited to, excessive use of system resources, non-payment or other billing issues, or identification by the abuse team as fraudulent or otherwise in violation of the T&C; or (f) causes beyond the control of Company or that are not reasonably foreseeable by Company (for example, Acts of God/Force Majeure).



For use of Product comprised of phone numbers and email addresses, Customer also agrees as follows:

**PHONE NUMBERS** As a courtesy and if asked by Client, Company may elect, but is not obligated, to perform a soft scrub against the Federal "Do Not Call" list for consumer lists only. Customer acknowledges and agrees that if consumer phone numbers are downloaded, emailed, delivered, or contacted in any manner, Customer must: (a) subscribe to all applicable Do-Not-Contact lists and (b) strictly abide by all Do-Not-Call rules and regulations. There shall be no responsibility or liability upon or of Company for determining whether phone numbers on its lists may be registered under Federal and/or State "Do Not Call" laws or other laws governing telemarketers, and Customer shall be fully responsible for compliance therewith in connection with the use of Product rented hereunder.

**EMAIL ADDRESSES** Customer agrees that any use of any Product to send email messages will be in compliance with all applicable Federal and State laws, including the CAN-SPAM Act of 2003 and Customer's own privacy policies. If Customer uses any Product to send email messages, such compliance by Customer must, at a minimum, include: (a) no forged, false or misleading header information; (b) no false or misleading subject lines; (c) the sender's physical address (not a P.O. Box); (d) clear indemnification of the email message as an advertisement; (e) an opt-out notice with a functioning opt-out mechanism via email or the Internet which is operational for at least 30 days after sending the message; and (f) honoring opt-out notices within ten (10) business days of receipt of each opt-out request. Subject to the terms and conditions of this Agreement, if Customer resells, shares, rents or transfers any Product, such compliance must, at a minimum, include prohibiting reselling, sharing, renting or transferring the email addresses of recipients who have opted out of receiving email messages. CUSTOMER FURTHER AGREES NOT TO SELL, SHARE, RENT OR TRANSFER DATA TO OR WITH ANY PERSON OR ENTITY WHICH DOES NOT AGREE TO USE DATA IN COMPLIANCE WITH ALL APPLICABLE STATE AND FEDERAL LAWS, INCLUDING THE CAN-SPAM ACT OF 2003, AND WITH ITS OWN PRIVACY POLICIES. For email data purchased from Company which Customer chooses to deploy themselves, Customer acknowledges that they understand some third-party email deployment services do not permit deployment of purchased email data. It is highly recommended that Customer check with its internet service provider and its email deployment company, especially, but not limited to, companies such as Mail Chimp, Constant Contact and iContact (by way of example), before deploying any type of email advertisements, announcements, or other correspondence of any type regardless of its relationship with email recipients. Company will not be held liable for any issues arising as a result of Customer's third party email deployment service. Company guarantees a valid email address rate of 90% and a hard bounce rate of 5% or less so long as: (i) data is deployed by client within five (5) business days of receipt of data from Company and (ii) Customer uses a third party email deployment service that allows for purchased emails to be used. Any requests for hard bounce replacements must be provided within fifteen (15) days of data delivery. The request must include the hard bounced emails and a delivery report proving the hard bounces. Although Company endeavors to provide quality products and services, there shall be no liability or responsibility for the success of Customer's email campaign due to factors beyond the reasonable control of Company including but not limited to: (A) tracking and quantifying the success of Customer's campaign; (B) the look and feel of Customer's creative; and (C) deployment strategies, etc. Due to these factors, it is recommended that Customer have Company deploy email campaigns to track bounces, open rates, click-through to website offers, etc. Email deployments are subject to use of supplemental advertising based on the discretion of Company's email team. Customer is allowing Company to use the creative design that Customer has supplied or approved, plus alternate, similar versions Company produces for backfill sources, including but not limited to, Yahoo Gemini, Gmail Ads, and Social Ads (Facebook/Instagram). Simultaneously with deploying Customer's email campaign, Company's backfill sources will target the same geography identified by Customer's campaign, but demographics will be expert-selected to maintain the integrity of Customer's targeting.

## **DIGITAL MARKETING SERVICES**

**Marketing Content.** Certain services may include a file management library allowing Customer to store and access certain marketing creative (e.g. logos, email creative, images) and other documents (collectively, "Marketing Content") for Customer's internal use. Any such Marketing Content and art will remain Customer's property; however, Customer gives Company permission to host, store, and to allow access to Customer's users. Customer is solely responsible for ensuring that it has all necessary rights and licenses to the Marketing Content and to use that Marketing Content in connection with the services. Company is not responsible for actions Customer takes with respect to

Customer's Marketing Content. Customer agrees to not upload Marketing Content that, or otherwise use the services, to: (a) violate the intellectual property rights of any third party; (b) engage in or promote illegal activity; or (c) distribute viruses, worms, or other malware or malicious software. Company reserves the right to delete or disable content alleged to violate the foregoing; however, Company has no obligation to monitor or review Customer's Marketing Content. Customer acknowledges that any file management library is made available for Customer's convenience and is not intended to be used as a data backup service or in connection with disaster recovery. Customer is responsible for maintaining independent copies of all Marketing Content, including backup copies. Marketing Content is subject to deletion upon termination.

**Third Party Services.** All software and platform fees will be paid by Customer directly to providers (CRM, Chat, Webinar, Hosting, Domains, Integrations, Automations, PRWire, Other).

**Ad Spend.** Ad spend is blended between web search and social media, and paid directly by Customer to advertising channels (Facebook Ad Manager, Google Ad Manager, LinkedIn Ad Manager, Bing Ad Manager, Twitter Ad Manager, etc.).

**Data Use.** Unless otherwise specified, if Customer is supplied with postal addresses, phone numbers or email addresses for a marketing campaign conducted/deployed by Company, said information is for Customer's internal use only.

**Cancellation.** For digital marketing services provided by Company to Customer, this Agreement will automatically renew at the end of the Term. Opt-out from services shall be provided in writing by sending an email to [compliance@giantpartners.com](mailto:compliance@giantpartners.com). Customer's opt-out term and any other pertinent information pertaining to digital campaigns is stated explicitly in the "Notes to Client" section of Customer's Order Confirmation. Once the stated Term has been reached, Customer may then provide written opt-out notice. **If Customer cancels prior to the opt-out Term, Customer will be responsible for the payments until the opt-out period has been reached.** Payment amount may be adjusted for service changes and one-time projects upon Customer's request.

**Notices and Other Communications** Any notice made in accordance with this Agreement shall be: (i) sent by certified mail or by recognized national overnight courier or express mail, (ii) effective upon receipt, and (iii) addressed to:

**Arbitration, Class Action Waiver and Governing Law** Any dispute, controversy or claim arising out of or relating in any way to this Agreement, including without limitation any dispute concerning the construction, validity, interpretation, enforceability or breach hereof, shall be exclusively resolved by binding arbitration upon a party's submission of the dispute to arbitration. In connection therewith:  
As set forth on the Order Confirmation:  
Customer Shipping Address  
Customer Contact Person  
Giant Partners, Inc.  
1461 Lawrence Dr, 2nd Floor  
Thousand Oaks, CA 91320  
Attn: Sheldon Katz, COO  
If to GP the event of a dispute, controversy or claim arising out of or relating in any way to this Agreement, the complaining party shall notify the other party in writing thereof. Within thirty (30) days of such notice, management level representatives of both parties shall attempt to resolve the dispute in good faith. Should the dispute not be resolved within thirty (30) days after such notice, the complaining party shall seek remedies exclusively through arbitration. The demand for arbitration shall be made within a reasonable time after the claim, dispute or other matter in question has arisen, and in no event shall it be made after two (2) years from when the aggrieved party knew or should have known of the controversy, claim, dispute or breach.

2. This Agreement to arbitrate shall be specifically enforceable. A party may apply to any court with jurisdiction for interim or conservatory relief, including without limitation a proceeding to compel arbitration.
3. THE PARTIES HEREBY WAIVE ANY RIGHTS THEY MAY HAVE TO HAVE DISPUTES LITIGATED IN A COURT, TO A TRIAL BY JURY, AND ANY RIGHTS THEY MAY HAVE TO PURSUE OR PARTICIPATE IN A CLASS OR COLLECTIVE ACTION IN ANY DISPUTE RELATING TO OR ARISING FROM THIS AGREEMENT.
4. The arbitration shall be conducted by one arbitrator. If the parties are not able to agree upon the selection of an arbitrator, within twenty (20) days of commencement of an arbitration proceeding by service of a demand for arbitration, the arbitrator shall be selected by the American Arbitration Association in accordance with the terms of this Agreement.

5. The arbitrator shall have ten (10) years of experience in contract dispute resolution and also shall have served as an arbitrator at least three (3) times prior to their service as an arbitrator in this arbitration.
6. The arbitration shall be conducted in accordance with the then existing Commercial Rules of the American Arbitration Association.
7. The arbitration shall be conducted in Ventura or Los Angeles Counties, California.
8. The laws of the State of California shall be applied in any arbitration proceedings (without regard to principles of conflict of laws) which shall be applied by the arbitrator in rendering a final decision.
9. It is the intent of the parties that, barring extraordinary circumstances, arbitration proceedings will be concluded within one hundred and twenty (120) days from the date the arbitrator is appointed. The arbitrator may extend this time limit in the interests of justice. Failure to adhere to this time limit shall not constitute a basis for challenging the award.
10. Except as may be required by law, neither a party nor its representatives may disclose the existence, content, or results of any arbitration hereunder without the prior written consent of all parties.
11. The parties shall be entitled to discovery in the arbitration except that any Party shall be entitled to request no more than one thousand (1,000) pages of documents and to take three (3) depositions not to exceed eight (8) hours for each such deposition. Any party shall be entitled to depose any expert who will testify in the arbitration proceeding but shall pay the fees of such expert during such deposition. In addition to the foregoing, any party shall be entitled to take the deposition of a witness who will testify at the arbitration but who is unavailable to testify at the hearing to preserve such witness' testimony for the arbitration hearing.
12. The parties shall exchange a copy of all exhibits for the arbitration hearing and shall identify each witness who will testify at the arbitration, with a summary of the anticipated testimony of such witness ten (10) days before the arbitration hearing.
13. The arbitrator shall have no authority to award punitive, consequential, special or indirect damages. The arbitrator shall not be entitled to issue injunctive and other equitable relief. The arbitrators shall award interest from the time of the breach to the time of award at the prejudgment interest rate under the California Civil Code. The cost of the arbitration proceeding and any proceeding in court to confirm or to vacate any arbitration award, as applicable (including, without limitation, reasonable attorneys' fees and costs), shall be borne by the unsuccessful party, as determined by the arbitrator, and shall be awarded as part of the arbitrator's award. It is specifically understood and agreed that any party may enforce any award rendered pursuant to these arbitration provisions by bringing suit in any court of competent jurisdiction.
14. These arbitration provisions shall survive the termination or cancellation of this Agreement.
15. Notwithstanding anything to the contrary in this Arbitration section, if any claim or dispute falls within the jurisdiction and limits of small claims court, in lieu of Arbitration, either party may pursue resolution of such claim or dispute in the Small Claims Division of Ventura County Superior Court.

## **MISCELLANEOUS**

**Amendments.** No modifications of this Agreement may be made unless they are in writing and hand signed by a duly authorized officer of the party to be charged.

**Time Being of the Essence.** Time is expressly declared to be the essence hereof, and it is specifically agreed that no waiver of any breach or default by Customer shall be deemed a waiver of any breach or default thereafter occurring.

**Counterparts.** This Agreement may be executed in electronically transmitted portable document format and may be in any number of counterparts each of which shall be deemed an original of the same document.

**Authority.** The person signing this Order Confirmation on behalf of Customer represents and warrants that: (i) he or she is duly authorized and has the legal capacity to execute and deliver this Order Confirmation and the related Terms & Conditions on behalf of Customer, (ii) the execution and delivery hereof and the performance of Customer's obligations hereunder have been duly authorized, and (iii) this Order Confirmation and the related Terms & Conditions is a valid and legal agreement binding on Customer and enforceable in accordance with its terms.

**For proper credit, please send the remittance form with payments. A finance charge of 1.5% per month shall be added to the balance due if the account is not paid within thirty (30) days from the invoice date.**

**ACCEPTANCE OF THIS ORDER CONSTITUTES ACCEPTANCE OF THESE TERMS  
AND CONDITIONS**

**From:** HubSpot noreply@notifications.hubspot.com  
**Subject:** Conor McDaniel has made you the Contact owner of the contact "Safa Gelardi"  
**Date:** April 23, 2024 at 12:18  
**To:** corey@giantpartners.com

H



## Conor McDaniel has made you the Contact owner of the contact "Safa Gelardi"



### CONTACT

Safa Gelardi


[sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)

[View Contact](#)

This message was sent to [corey@giantpartners.com](mailto:corey@giantpartners.com) because your preferences are set to receive notifications like this. You can change it in your [notification preferences](#) page.

[giantpartners.com](https://giantpartners.com) (Hub ID: 4536250)

HubSpot, Inc.  
2 Canal Park  
Cambridge, MA 02141


**From:** Eugene Liddie eugene@imecompanions.com   
**Subject:** Accepted: GiantPartners & IMECompanion - Strategy Proposal  
**Date:** August 24, 2022 at 13:11  
**To:** corey@giantpartners.com

---

EL



Mail Attachment

**From:** Jeremy Koenig jeremy@giantpartners.com   
**Subject:** Accepted: GiantPartners & IME Legal Rep- Website Discussion @ Thu Mar 21, 2024 10am - 11am (PDT) (Corey Weissman)  
**Date:** March 20, 2024 at 13:57  
**To:** Corey Weissman corey@giantpartners.com

JK

**Jeremy Koenig has accepted this invitation.**

### Join with Google Meet

#### Meeting link

[meet.google.com/vyh-eywu-azj](https://meet.google.com/vyh-eywu-azj)

#### Join by phone

(US) [+1 402-629-0119](tel:+14026290119)

PIN: 715239462

[More phone numbers](#)

#### When

Thursday Mar 21, 2024 · 10am – 11am (Pacific Time - Los Angeles)

#### Guests

Corey Weissman - organizer

Jeremy Koenig

[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)

[View all guest info](#)

Invitation from [Google Calendar](#)

You are receiving this email because you are subscribed to calendar notifications. To stop receiving these emails, go to [Calendar settings](#), select this calendar, and change "Other notifications".

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners/ListGiant - Follow up- Data & Digital Marketing Resource  
**Date:** March 12, 2024 at 10:47  
**To:** Safa Gelardi safagelardi@gmail.com

CW

Hi Safa,

I hope all is well with you, I know it's been awhile since you and I last spoke. I wanted to check in and see how business is going and if you ended up settling things with that lady?

Either way we hope to still be a resource for you and Eugene and would love to discuss working together again in the future.

Please let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)



**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners- Meeting Link  
**Date:** April 10, 2023 at 14:01  
**To:** Safa Gelardi safagelardi@gmail.com

CW

Hi Safa,

Here is the link to the meeting just in case:

[meet.google.com/dxf-dget-xww](https://meet.google.com/dxf-dget-xww)cont

[Join by phone](#)

(US) +1 662-434-4884 PIN: 465 574 345#

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



**GIANTPARTNERS**

[Connect on LinkedIn](#)

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners Follow up- Partnership Update  
**Date:** May 19, 2023 at 14:58  
**To:** Safa Gelardi safagelardi@gmail.com, IME Legal Reps imelegalreps@gmail.com

CW

Hi Safa and Eugene,

I hope all is well with you, unfortunately I have not been able to get a hold of Eugene and the number you gave me Safa the voicemail isn't set up so I cannot leave a message.

I have our team asking for an update regarding the marketing for IME Legal Reps as you mentioned you would have an update for us after 5/15 sometime to let us know when we can start the marketing campaigns.

Do you have any updates for us or can we schedule a time to discuss any updates?

Let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

**From:** Corey Weissman corey@giantpartners.com

**Subject:** GiantPartners Follow up- New Agreement

**Date:** March 20, 2024 at 11:21

**To:** eugene@imecompanions.com, IME Legal Reps imelegalreps@gmail.com, Safa Gelardi safagelardi@gmail.com, Safa Gelardi sgelardi@imecompanions.com

**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.

I would like to schedule a call with you and Safa and Jeremy and myself so we can discuss what you guys need and that way we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again soon.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

**From:** Corey Weissman corey@giantpartners.com

**Subject:** GiantPartners Follow up- New Agreement

**Date:** March 20, 2024 at 11:21

**To:** eugene@imecompanions.com, IME Legal Reps imelegalreps@gmail.com, Safa Gelardi safagelardi@gmail.com, Safa Gelardi sgelardi@imecompanions.com

CW

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.

I would like to schedule a call with you and Safa and Jeremy and myself so we can discuss what you guys need and that way we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again soon.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners Follow up- Marketing for IME Legal Rep  
**Date:** June 13, 2023 at 13:25  
**To:** eugene@imecompanions.com, IME Legal Reps imelegalreps@gmail.com  
**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Eugene,

I hope all is well with you, I wanted to check in and see when we will start marketing for you IME Legal Reps?

Please let me know ASAP.

Thanks,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners Follow up- Checking in  
**Date:** March 21, 2023 at 16:32  
**To:** Safa Gelardi sgelardi@imecompanions.com  
**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Safa!

I hope all is well with you, I just wanted to check in with you and see how everything is going?

Per my notes from our last conversation we are going to continue sometime between May-June this year.

We look forward to continuing our partnership together and rebuilding momentum as soon as possible!

Let me know your thoughts and if you have any questions.

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** GiantPartners Follow up  
**Date:** May 17, 2023 at 12:18  
**To:** IME Legal Reps IMELegalReps@Gmail.com  
**Bcc:** 4536250@bcc.hubspot.com

CW

Hi Eugene!

I hope all is well with you, Safa mentioned that there was a court date this week and that we would start marketing after that. Have there been any updates on your side?

We look forward to hearing from you and starting the marketing efforts ASAP!

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

ES

**From:** Estefania Sedano estefania@giantpartners.com  
**Subject:** IME Legal Reps - Updates  
**Date:** April 18, 2023 at 15:13  
**To:** Safa Gelardi safagelardi@gmail.com  
**Cc:** Conor McDaniel conor@giantpartners.com, Corey Weissman corey@giantpartners.com, Manuel Cabrera manuel@giantpartners.com

---

Hey Safa,

Hope all is well!

I wanted to check in and send you an update on the work in progress - see below.

#### **Branding**

- Currently, the logo and colors mockups are in Quality Control, once we have approval from Scott I will be sending these.

#### **Website transfer**

- On Friday we moved the website development to the new domain: <https://imelegalreps.com/> and while we get the new branding approved and ready, we have removed any IME Companion logo or wording in the website.

#### **New Social & Paid Accounts**

- In order to set up the new Social Media and Paid accounts (such as Google Ads and LinkedIn), there are two ways to do it:
  - You can share the login information of the email you want to register all accounts.
  - Or we can schedule a meeting and do it together.

For the meeting, we can do

**Wednesday** at 10:00 am or 1:00 pm - 3:30 pm PDT

**Thursday** at 9:00 am - 1:00 pm PDT

Let me know what works for you!

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)



ES

**From:** Estefania Sedano estefania@giantpartners.com

**Subject:** IME Legal Reps <> GP - Account Access Meeting

**Date:** April 24, 2023 at 13:35

**To:** IME Legal Reps imelegalreps@gmail.com

**Cc:** Conor McDaniel conor@giantpartners.com, Corey Weissman corey@giantpartners.com, Dan Millet danmillet@giantpartners.com

---

Good morning Eugene,

Hope all is well!

When ready, please join our meeting with the following link <https://meet.google.com/oen-czog-dew>

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

## Why Isn't an IME Independent?

- No-fault insurance companies and health insurance companies want to discontinue making payments for medical treatment.
- Insurance companies cannot discontinue payments for medical treatment without a doctor's report.
- The doctors are hired by insurance companies that pay for the medical exams.
- These doctors perform many medical exams all day long. Each exam usually takes only minutes, and the doctors' income from doing IMEs can be as high as 6-7 figures per year.
- The doctor hired by the insurance company is not your doctor.

Dear -----, thank you for inquiring about our services,

I'd like to introduce you to IME Companions. IME Companions is an innovative company that ensures plaintiff attorneys have an independent record of what transpired during an IME visit. For over 5 years IME Companions has been there for law firms and their clients during their defense-ordered medical exams, IME Companions and its team of trained advocates provide attorneys an extension to reach across the nation to be at their client's defense-ordered exams when they cannot be. The role of each Companion is to be there every step of the way- from client preparation to being in the exam room with them and even in court. Law firms can trust that their client's exams will go as smoothly as possible, and will grant the best results. Our mission is to balance the scales of justice, **We are there to do what you would do if you were to attend the IME.** We are an Owner operated family-run business, establishing ourselves as the lead provider of advocates during IMEs, and we can ensure a successful and professional IME visit for your clients. IME Companions has very qualified Companions. Our reports are robust and timely, and we have a web portal that will enable your firm to not only access all historical reports done through us but to also seamlessly schedule future exams.

When you hire us, you can expect that we will conscientiously and diligently perform the following:

- Interview you to determine your needs for the exam.
- Call your client 24 hours before the IME to make sure he/she will be attending and provide directions, if necessary.
- Meet your client at the location of the IME.
- Take a high-resolution picture of the IME sign-in sheet which will then be converted to PDF format and forwarded to you.
- Observe the examination and take detailed notes of the intake questions and answers, the type of tests the doctor conducts, the plaintiff's performance during those tests, the length of the examination, and any other relevant points during the exam.
- We also ensure that your client does not permit the doctor to perform any unauthorized tests such as X-rays or MRIs.
- Provide a brief profile of the examining doctor.

- We will E-mail you, within 5 business days, a detailed report including all of our notes and observations.

Our job begins the moment an IME is assigned to our office. Along with the vendor's notice, BPs and any special requests from your office are sent to ours. An IME Companion is assigned to your client's IME. The IME Companion reviews the BPs and takes some notes. Your client is called the evening before the IME, where they are briefed over the phone on what to expect the next day during the IME visit, and the importance of being there on time, dressing comfortably, and not volunteering information. The IME Companion arrives the next day 15 minutes before the scheduled IME, where they will again brief your client, and answer any questions your client may have regarding the IME. A report is made and emailed to you thereafter.

**What makes us different is that we are owner-operated and family-run, you can access us at any time any day, and we take responsibility for your business because your business is our business. We take pride in our ability to advocate for plaintiffs during their IMEs while being extremely professional. Most IME Physicians know who IME Companions are, and they respect and understand what we do; as one of our important values is Professionalism.**

**We have Companions who speak: English, Spanish, Russian, Creole, French, Portuguese, Arabic, Urdu, and Hindi.**

Due to our proven success and proficiency, we work with the best. Our current clients include Subin Associates, Silberstein Awad Miklos, Zaremba Brown, Zemsky & Salomon, Bergman, Bergman & Lamonsoff, Alan Ripka & Associates, Raskin & Kremins, Gregory Spektor & Associates, and many more.

The IME Companion professional who attends the IME will also be available to submit an affidavit in support of your opposition to the defendant's motion for summary judgment and testify at trial.

First Hour - \$175

Additional Half Hour – \$45

Outside NYC and NYS is an extra fee

No extra fees apply for anywhere in Brooklyn, Bronx, Manhattan, and Queens.

No extra fees apply for bilingual Companions.

Looking forward to working with you.

Please feel free to reach out to me at any time; IME Companions is prepared and ready to protect your clients.

<https://www.prnewswire.com/news-releases/ime-companions-is-providing-legal-advocates-for-law-firms-to-help-veterans-in-the-3m-combat-arms-earplug-class-action-lawsuit-301490598.html>

Best Regards,

Safa Gelardi

Chief Executive Officer

Office: 833-463-7767

Direct: 718-749-4732

**P.O. BOX 90398**

**STATEN ISLAND NY 10309**

Email: [sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)

[www.imecompanions.com](http://www.imecompanions.com)

IME- Email Ex:

Workers Compensation IMEs, NYS WC Law allows IMEs to be videoed. You can use these videos to rebut a WC denial.

-NF IMEs where the Plaintiff is a Pedestrian, Bicyclist, or the NF Carrier is the City (MTA, NYPD, FDNY etc), ultimately when a Pedestrian or Bicyclist is hit by a motor vehicle, the NF IME really is a DME.

-Defense IMEs, IME Watchdogs can be and have been used as rebuttal witnesses against Defense Doctors.

It cost \$210 to put a case in suit, our average price per IME is less than \$200.

IME Watchdog can proudly say that it is the ONLY company in the NYC area that has successfully litigated against defense firms, and the only company with a proven track record of providing the most beneficial rebuttal testimonies against Defense Physicians.

Recently one of our clients stated the following:

["IME Watchdog was instrumental in securing a 7-figure verdict for our client in New York County. The defense medical doctor claimed to have performed a series of orthopedic exams in 1-2 seconds in order to account for an extremely short examination time. However, an IME Watchdog testified that the doctor, in fact, never performed the tests and never used a goniometer in testing the plaintiff's range of motion. Having spoken to the jury after the verdict was rendered, it is clear to me that the IME Watchdog's testimony helped convince the jury that the defense medical doctor was not credible."]

-Stephen D. Wagner III

Wingate, Russotti, Shapiro, Moses & Halperin, LLP]

The benefits and values of sending an IME Watchdog to your client's IMEs clearly outweigh the cost. Additionally, IME Watchdog services are a legal disbursement.

Switch to the refreshed navigation

Contacts

Conversations

Marketing

Sales

Commerce

Service

Automation

Reporting

Template Marketplace

Partner

Safa Gelardji

IME Companions

sgelardji@imecompanions.com

Note

Email

Call

Task

Meeting

More

About this contact

Contact owner

Conor McDaniel

First name

Safa

Last name

Gelardji

Company name

IME Companions

Website URL

http://www.imecompanions.com

Industry (Select)

Industry (Description)

LinkedIn URL

Job title

Email

sgelardji@imecompanions.com

Phone number

Extension

Mobile phone number

Status

Contact person

Overview

Activities

Search activities

Activity

Notes

Emails

Calls

Tasks

Meetings

Filter by: Filter activity (1/39)

All users

All teams

March 2024

Email - GiantPartners Follow up- New Agreement from Corey Weissman

Corey Weissman

Open: 4 Click: 0

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.

I would like to schedule a call with you and Safa and Jeremy and myself so we can discuss what you guys need and that way we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again soon.

All my best,

Corey

COREY WEISSMAN

Giant Partners, Database Marketing Advisor


Call: (805) 267-1375 ext 126

Text: (805) 425-9532

Email: corey@giantpartners.com

Calendar: Book meeting

LinkedIn: Connect



associations

March 2023

Email - GiantPartners Follow up- Checking in from Corey Weissman

Corey Weissman

Open: 3 Click: 0

Hi Safa,

I hope all is well with you, I just wanted to check in with you and see how everything is going?

Per my notes from our last conversation we are going to continue sometime between May-June this year.

We look forward to continuing our partnership together and rebuilding momentum as soon as possible.

Let me know your thoughts and if you have any questions.

All my best,

Corey

COREY WEISSMAN


Giant Partners

Database Marketing Specialist

corey@giantpartners.com

Office: (805) 267-1375 ext 126

Direct: (805) 871-0425



Connect on LinkedIn

association

February 2023

Email - Fwd: GP - Lead Nurturing Flow from Corey Weissman

Corey Weissman

Open: 15 Click: 0

Please see the email below:

COREY WEISSMAN


Giant Partners

Database Marketing Specialist

corey@giantpartners.com

Office: (805) 267-1375 ext 126

Direct: (805) 871-0425



Connect on LinkedIn

View thread (4)

association

Email - Re: GP - Lead Nurturing Flow from Corey Weissman

Corey Weissman

Open: 15 Click: 0

Hi Safa,

I hope all is well with you, below is the link of access to the data we are targeting across all channels.

In total we are targeting 53k+ throughout all platforms and approx. 8-10k via email.

Here is the google drive link:

https://drive.google.com/drive/folders/1L8F7mtZTL8UgUqPYPXn3TsWIGSMko

Please let me know if you have any questions or need anything else!

All my best,

Corey

COREY WEISSMAN

Giant Partners

Database Marketing Specialist

corey@giantpartners.com

Office: (805) 267-1375 ext 126

Direct: (805) 871-0425

Companies (1)

Primary

IME Companions

imecompanions.com

+1 (800) 409-9921

Last activity date: 05/20/2024 9:22 AM PDT

View associated companies

Deals (8)

IME Companions: DG : 236416-6 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

IME Companions: DG : 236416-5 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

IME Companions: DG : 236416-4 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

IME Companions: DG : 236416-3 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

IME Companions: DG : 236416-2 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

Show more

View associated deals


Attachments

new

See the files attached to your activities or uploaded to this record.

Contacts (0)

See the people associated with this record.



Connect on LinkedIn

View thread (4)

3 associations

**Email - GP - Lead Nurturing Flow from Conor McDaniel**

Pin Copy Link Nov 8, 2022 at 8:55 AM PST

Reply all Reply Forward Delete

Conor McDaniel  
to Sofia Gelardi, Tiffany Laszlo, Corey Weissman

Opens: 15 Clicks: 0

Hey Sofia,

I hope all is well with you!

My team has brought to my attention that they would like to set up a lead-nurturing flow for you in order to increase contact rates with leads generated.


I'm going to have them move forward with this, at no additional cost to you. The team thoroughly enjoys working for IME Comparisons and wants to see more of these leads convert to more business for you.

We will reach out to you for guidance on copy. We will have this set up for you ASAP.

Thank you, Sofia!

Cheers,

CONOR MCDANIEL  
Director of Operations  
conor@giantpartners.com  
(805) 267-1575 x151  
Connect on LinkedIn



View thread (4)

5 associations

November 2022

**Email - GP - WP Login from Conor McDaniel**

Pin Copy Link Nov 26, 2022 at 7:15 PM PST

Reply all Reply Forward Delete

Conor McDaniel  
to Sofia Gelardi

Opens: 1 Clicks: 0


URL: [www.imecomparisons.com/wp-admin](http://www.imecomparisons.com/wp-admin)

Username: Conor

Password: GPhonx12\*

Cheers,

CONOR MCDANIEL  
Director of Operations  
conor@giantpartners.com  
(805) 267-1575 x151  
Connect on LinkedIn



View thread (4)

2 associations

**Email - Re: Account Alert: Sofia Gelardi's given you account access. from Conor McDaniel**

Pin Copy Link Nov 24, 2022 at 7:01 PM PST

Reply all Reply Forward Delete

Conor McDaniel  
to Sofia Gelardi, Tiffany Laszlo, Corey Weissman


Opens: 3 Clicks: 0

Hey Sofia,

We are creating a new user for you now - I will have this momentarily.

Cheers,

CONOR MCDANIEL  
Director of Operations  
conor@giantpartners.com  
(805) 267-1575 x151  
Connect on LinkedIn



On Tue, Nov 29, 2022 at 2:08 PM Sofia Gelardi <[sgelardi@imecomparisons.com](mailto:sgelardi@imecomparisons.com)> wrote:

Tiffany, This is the same info I was using. I never changed the email, user name or password. You sent me the same credentials, I was using. Why can't I get in. I need to print out the work and assign for tomorrow. I need to get in. I can't even use last password option. Every email I entered is not working. Please, I need to get in

From: Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>

Sent: Tuesday, November 29, 2022 4:55 PM

To: Sofia Gelardi <[sgelardi@imecomparisons.com](mailto:sgelardi@imecomparisons.com)>

Cc: Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Subject: Re: Account Alert: Sofia Gelardi's given you account access.

Hi Sofia,

Thank you for the updates.

Please see the link below for the website and the credentials that we have on the google drive document:

- <https://imecomparisons.com/>
- [Credentials Form / Access to Client Website](#)

user Id - ICMMain

Paswd - Success2019##

- PW: IMEGPlogn2023
- Hosting/Domain Service
- Username: [Info@imecomparisons.com](mailto:Info@imecomparisons.com)
- Password: Pupa95079

As for the TikTok account if it is not letting you log in with those credentials it may not have saved the account information as there was personal information missing. You'll need to use the information below to create a new account:

- TikTok (use info below)
  - Username: IME Comparisons
  - Email: [sofiagelardi@gmail.com](mailto:sofiagelardi@gmail.com)
  - New PW: YH029208#
  - Not IAC: [imecomparisons.com](mailto:imecomparisons.com)
  - Not Password: Money520
- Account creation link: <https://www.tiktok.com>


You will need to finish creating this on your end due to personal questions, DOB, Phone, and a 2Factor Authorization during the setup to prove it is your information.

Also please provide feedback on the email sequences listed in the above email in the google drive folder.

Please let me know if you have any questions or issues accessing the website.

Best,

Tiffany Laszlo  
Giant Partners  
Account Manager  
Office: (805) 267-1575 x 160  
Text: (805) 626-3000  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)





Connect on LinkedIn

On Tue, Nov 29, 2022 at 1:12 PM Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)> wrote:

Please help me get access to the web back end of my website. I am unable to log in. I need to log in to assign the work for tomorrow. Please let me know if there was a change in credentials from your end.

From: Tiffany Laxzio <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>

Sent: Tuesday, November 29, 2022 1:52 PM

To: Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)>

Cc: Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Subject: Re: Account Alert: Safa Gelardi's given you account access.

Thank you Safa,

We should have all the access we need for the website now, we just needed to update the URL link. We were also waiting on your TikTok account. If you could please make sure you can log in and have all the correct business and personal information set up that would be great. Please see the information below:

- TikTok (use info below)
- Username: IME Companions
- Email: [safagelardi@gmail.com](mailto:safagelardi@gmail.com)
- New PW: Vln291D88
- Not EM: [imecompanion.com](mailto:imecompanion.com)
- Not Password: Money201
- Account creation link: <https://www.tiktok.com>

You will need to finish creating this on your end due to personal questions, OGB, Phone, and a 2Factor Authorization during the setup to prove it is your information.

Please see the website and content linked below.

- <https://imecompanion.flywheelites.com/>
- Email Sequences

Looking forward to hearing from you soon.

Best,

Tiffany Laxzio

Giant Partners

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 828-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

Connect on LinkedIn

On Tue, Nov 29, 2022 at 7:36 AM Safa Gelardi via GoDaddy <[rdonoreply@godaddy.com](mailto:rdonoreply@godaddy.com)> wrote:



Need help? Contact  
Customer Number: 146835

You now have access to Safa Gelardi's account.

Accept Access →

You need to accept within the next 48 hours. By doing so, you agree to the Delegate Access Terms of Service.

Please do not reply to this email. Emails sent to this address will not be processed.

Copyright © 1999-2022 GoDaddy Operating Company, LLC. 1151 E. GoDaddy Way, Tempe, AZ 85294 USA. All rights reserved.

584855744

5 associations

→ Email - Re: IME HubSpot Account Notifications from Conor McDaniel

Pin Copy Link Nov 2, 2022 at 4:37 PM PST

Reply all Reply Forward Delete



Conor McDaniel

To: Safa Gelardi, Tiffany Laxzio, Steve Page, Corey Weissman

Hi Safa,

Hey Safa,

Thank you for your time just now.

To recap, we will build a lead nurturing sequence for all new leads.

You had mentioned specific copy that you wanted in these emails. Can you send this over to us? Upon receipt, our copywriters will begin drafting up a 3 email sequence.

Thank you, Safa,

Cheers,

CONOR MCDANIEL

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

Connect on LinkedIn



**GIANTPARTNERS**

America's #1 Data Driven Marketing Agency

On Wed, Nov 2, 2022 at 4:39 PM Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)> wrote:  
Perfect thanks Tiffany

From: Tiffany Laxzio <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>

Sent: Wednesday, November 2, 2022 7:39 PM

To: Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)>

Cc: Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Steve Page <[stevep@giantpartners.com](mailto:stevep@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Subject: Re: IME HubSpot Account Notifications

Hi Safa,

Understood

Sorry, I missed your call, my phone has not been working correctly for the past week or so. It's better if you call or text my Google voice number:

- (805) 828-3050

I'll have the team work on these email templates for you. Once we have this ready I'll send it over for your review.

Best,

Tiffany Laxzio

Giant Partners

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 828-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

Connect on LinkedIn

On Wed, Nov 2, 2022 at 4:21 PM Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)> wrote:

Scratch that do not upgrade the hubspot, I will send the emails from my outlook. I just want a nice looking template where I can put in rates and a short paragraph on what the business is about

From: Tiffany Laxzio <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>

Sent: Wednesday, November 2, 2022 7:08 PM

To: Safa Gelardi <[sgelardi@imecompanion.com](mailto:sgelardi@imecompanion.com)>

Cc: Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Steve Page <[stevep@giantpartners.com](mailto:stevep@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Subject: Re: IME HubSpot Account Notifications

Hi Safa,

Hope this email finds you well.

Our team got your message about the email automation and we have a few options for you before we can get that set up. We can upgrade your current Hubspot account or we can try to run these email



Switch to the enhanced navigation

Contacts Conversations Marketing Sales Commerce Service Automation Reporting Template Marketplace Partner

Collect insights with your CRM

Search HubSpot

Contacts

Safa Gelardi

Partner at IME Companions

safagelardi@gmail.com

Note Email Call Task Meeting More

About this contact

Contact owner: Corey Weissman

First name: Safa

Last name: Gelardi

Company name: IME Companions

Website URL: https://imecompanions.com/

Industry (Select)

Industry (Description)

LinkedIn URL

Job title: Partner

Email: safagelardi@gmail.com

Phone number: +1 (718) 749-4732

Extension

Mobile phone number

Status

Contact person

Overview

Activities

Search activities

Activity Notes Emails Calls Tasks Meetings

Filter by: Filter activity (1/39) All users All teams

March 2024

Email - GiantPartners Follow up- New Agreement from Corey Weissman

Corey Weissman

To: safa@imecompanions.com, DME Legal Reps, Safa Gelardi, Safa Gelardi

Opens: 4 Closes: 0

Hi Eugene,

It was a pleasure speaking with you yesterday and today regarding your website and us potentially working together again.

I would like to schedule a call with you and Safa and Jeremy and myself so we can discuss what you guys need and that way we can customize the agreement and present a new price structure to you.

Please let me know your availability for a call as we look forward to hearing from you and working with you again soon.

All my best,

Corey

COREY WEISSMAN

Giant Partners, Database Marketing Advisor


Call: (805) 267-1575 ext 128

Text: (805) 625-9332

Email: corey@giantpartners.com

Calendar: Book meeting

LinkedIn: Connect



GIANTPARTNERS

Inc.

1 association

Email - GiantPartners/ListGiant - Follow up- Data & Digital Marketing Resource from Corey Weissman

Corey Weissman

To: Safa Gelardi

Opens: 1 Closes: 0

Hi Safa,

I hope all is well with you, I know it's been awhile since you and I last spoke. I wanted to check in and see how business is going and if you ended up setting things with that lady?

Either way we hope to still be a resource for you and Eugene and would love to discuss working together again in the future.

Please let me know your thoughts.

All my best,

Corey

COREY WEISSMAN

Giant Partners, Database Marketing Advisor


Call: (805) 267-1575 ext 128

Text: (805) 625-9332

Email: corey@giantpartners.com

Calendar: Book meeting

LinkedIn: Connect



GIANTPARTNERS

Inc.

1 association

February 2024

Email - LintGiant/GiantPartners- Follow up- Checking in from Corey Weissman

Corey Weissman

To: Safa Gelardi

Sent

Hi Safa,

Happy New Year! I hope all is well with you, I wanted to check in and see if you are still working with Eugene at IME? How's everything going on your side?

We hope to still be a resource for you for any targeted data list or digital marketing services.

Please let me know your thoughts.

All my best,

Corey

COREY WEISSMAN

Giant Partners, Database Marketing Advisor


Call: (805) 267-1575 ext 128

Text: (805) 625-9332

Email: corey@giantpartners.com

Calendar: Book meeting

LinkedIn: Connect



GIANTPARTNERS

Inc.

1 association

June 2023

Email - Re: IME Legal Reps - Website Review from Corey Weissman

Corey Weissman

To: IME Legal Reps, Safa Gelardi, Dan Hiller, Connor McDeviss, Emeliana Bedano

Hi Eugene!

I hope all is well with you and Safa. I wanted to check in as I have been unable to reach you over the phone. Is there a good day or time we can talk more about when you would like us to start the marketing campaign efforts?

Please let me know if you have any questions or concerns.

My direct line is: 805-873-0425.

We look forward to hearing from you soon!

Thanks,

Companies (1)

Primary

IME Companions

imecompanions.com

+1 (800) 439-9921

Last activity date: 05/20/2024 9:22 AM PDT

View associated companies

Deals (8)

IME Companions: DG : 238416-6 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

IME Companions: DG : 238416-5 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

IME Companions: DG : 238416-4 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

IME Companions: DG : 238416-3 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

IME Companions: DG : 238416-2 : Recurring Business

Amount: \$12,250.00

Stage: Won Opportunity

Deal owner: Corey Weissman

Show more

View associated deals

Attachments

See the files attached to your activities or uploaded to this record.

Contacts (0)

See the people associated with this record.

Corey

**COREY WEISSMAN**  
corey@giantpartners.com  
(805) 267-1575 ext 126  
[Schedule meeting](#)

...

[View thread \(9\)](#)

10 associations +

✉ Email - Re: GiantPartners Follow up Marketing Efforts from Corey Weissman

[Pin](#) [Copy link](#) Jun 9, 2023 at 8:50 AM PDT



**Corey Weissman**  
to Sofia Georghi, IME Legal Reps -  
1 Open: 2 Clicks: 0

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)

Hi Eugene and Sofia,

I hope all is well with you both, I wanted to see if you could please update us regarding the marketing efforts for IME Legal Reps?

Our team is awaiting an update from you since we started updating your website back in April.

If either of you could please update us that would be greatly appreciated.

Let me know if you have any questions or concerns!

All my best,

Corey

**COREY WEISSMAN**  
corey@giantpartners.com  
(805) 267-1575 ext 126  
[Schedule meeting](#)

...

[View thread \(2\)](#)

7 associations +

✉ Email - GiantPartners Follow up Marketing Efforts from Corey Weissman

[Pin](#) [Copy link](#) Jun 9, 2023 at 2:08 PM PDT



**Corey Weissman**  
to Sofia Georghi, IME Legal Reps, 453625@cc.hubspot.com -  
1 Open: 2 Clicks: 0

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)

Hi Eugene and Sofia

I hope all is well with you both, unfortunately I haven't been able to get a hold of either of you!

I wanted to check in regarding the court date in May that you mentioned you wanted to wait until that was over to begin the marketing efforts.

I have our team asking what is going on with this partnership.

Could either one of you please update me regarding when we can start marketing?

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners, Database Marketing Advisor  
Call: (805) 267-1575 ext 126  
Text: (805) 625-9332  
Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)  
[Contactor Book meeting](#)  
[LinkedIn Connect](#)



**GIANTPARTNERS**  
Database Marketing & Sales

...

[View thread \(2\)](#)

7 associations +

✉ Email - Re: GiantPartners Follow up- Update for IMELegalReps & Eugene from Corey Weissman

[Pin](#) [Copy link](#) Jun 1, 2023 at 2:28 PM PDT



**Corey Weissman**  
to Sofia Georghi, IME Legal Reps -  
1 Open: 2 Clicks: 0

[Reply all](#) [Reply](#) [Forward](#) [Delete](#)

Hi Sofia and Eugene,

I hope all is well with you, I wanted to check in and see if you have any updates regarding the marketing for IME Legal Reps?

We were waiting for your response on 5/15 regarding the court date you mentioned and we hope to hear from you soon!

Please let me know if there's a good day or time we can talk!

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-9425



**GIANTPARTNERS**  
Database Marketing & Sales

[Connect on LinkedIn](#)

...

[View thread \(2\)](#)

4 associations +

May 2023

✉ Email - GiantPartners Follow up- Update for IMELegalReps & Eugene from Corey Weissman

[Pin](#) [Copy link](#) May 30, 2023 at 2:13 PM PDT



**Corey Weissman**  
to Sofia Georghi -  
1 Open: 1 Clicks: 0

[Reply](#) [Forward](#) [Delete](#)

Hi Sofia,

I hope all is well with you, I wanted to check in and let you know we have been unsuccessful in reaching Eugene and we would like to know what's going on with IMELegalReps.

Can we start marketing? Can you have Eugene call us?

He hasn't picked up his phone and won't respond via email.

Please let me know ASAP

Thanks,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist





**Website transfer**

- On Friday we moved the website development to the new domain: <https://imelagatrep.com>. Once we get the new branding approved and ready, we have removed any IME Companion logo or wording in the website.

**New Social & Paid Accounts**

- In order to set up the new Social Media and Paid accounts (such as Google Ads and LinkedIn), there are two ways to do it:
  - You can share the login information of the email you want to register all accounts.
  - Or we can schedule a meeting and do it together.

For the meeting, we can do:

**Wednesday** at 10:00 am or 1:00 pm - 3:30 pm PDT

**Thursday** at 9:00 am - 1:00 pm PDT

Let me know what works for you!

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

9 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 9:44 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Connor McDonald, imelagatrep@gmail.com, Corey Williamson, Scott Owen, Steve Page, ...  
Opens 24 Clicks 0

Hey Sofia,

The team needs to get login approval. They have sent a Godaddy code to your email, could you please provide it?

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 9:15 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Connor McDonald, imelagatrep@gmail.com, Corey Williamson, Scott Owen, Steve Page, ...  
Opens 19 Clicks 0

Hey Sofia,

Currently working on it! Let me check in with the team.

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 14, 2023 at 8:59 AM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Sofia Gelardi, Connor McDonald, imelagatrep@gmail.com, Corey Williamson, Scott Owen, Steve Page, ...  
Opens 13 Clicks 0

Good morning Sofia,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - Re: GP - IME Legal Reps from Estefania Sedano** Pin Copy link Apr 13, 2023 at 2:43 PM PDT  
Reply all Reply Forward Delete

**Estefania Sedano**  
to Connor McDonald, Sofia Gelardi, imelagatrep@gmail.com, Corey Williamson, Scott Owen, Steve Page, ...  
Opens 18 Clicks 0

Hi Sofia,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Connor's question, for IME Sales Rep branding can we use the same colors as IME Companion?

Cheers,

Estefania Sedano

**Giant Partners**  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.150  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

...

View thread (11) 13 associations

---

**Email - GP - IME Legal Reps from Connor McDonald** Pin Copy link Apr 13, 2023 at 10:55 AM PDT  
Reply all Reply Forward Delete

**Connor McDonald**  
to Sofia Gelardi, imelagatrep@gmail.com, Corey Williamson, Estefania Sedano, Scott Owen, Steve Page, ...  
Opens 44 Clicks 0

Hey Sofia,

I hope all has been well! It's great to have you back on board!

I want to introduce you to your Account Manager, Ekaterina Sedano! You're in excellent hands with Ekaterina.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the DME Companions website over to the [linklegalregs.com](https://linklegalregs.com) domain and respond for DME Legal Regs.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For DME Legal Regs, can we use the same colors as DME Companions?

Thank you, Sofia!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



View thread (11)

12 associations

✉ Email - GiantPartners- Meeting Link from Corey Weissman

Pin Copy link Aug 30, 2022 at 11:02 AM PDT

**Corey Weissman**

To: Sofia Sedano

Re: Sofia Sedano

Hi Sofia,

Here is the link to the meeting just in case:

[meet.google.com/za7-tqgr-rvaw](https://meet.google.com/za7-tqgr-rvaw) content\_copy

Join by phone  
(US) +1 662-434-4834 PIN: 485 574 3458

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (805) 267-1575 ext 126  
Direct: (805) 871-9425



[Connect on LinkedIn](#)

View thread (5)

5 associations

October 2022

✉ Email - Re: Subdomain for DME from Tiffany Lazlo

Pin Copy link Oct 12, 2022 at 12:13 PM PDT

**Tiffany Lazlo**

To: Sofia Sedano, Steve Page, Corey Weissman

Hi Sofia,

A code was sent to your email from Meta we need that as soon as you can send it over.

Thank you.

**Tiffany Lazlo**  
Giant Partners  
Account Manager  
Office: (805) 267-1575 x 160  
Text: (805) 828-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

View thread (8)

10 associations

✉ Email - Re: Subdomain for DME from Tiffany Lazlo

Pin Copy link Oct 12, 2022 at 10:06 AM PDT

**Tiffany Lazlo**

To: Sofia Sedano, Steve Page, Lumina Support, Conor McDaniel, Corey Weissman

Hi Sofia,

Regarding Vera's email please let us know if the credentials listed below are correct as we were having issues accessing the domain.

- Hosting/Domain Service Name (ex. GoDaddy)
- Username: [info@linklegalregs.com](mailto:info@linklegalregs.com)
- Password: Pupa2079!

Best,

**Tiffany Lazlo**  
Giant Partners  
Account Manager  
Office: (805) 267-1575 x 160  
Text: (805) 828-3050  
Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

View thread (8)

10 associations

✉ Email - Re: Subdomain for DME from Lumina Support

Pin Copy link Oct 12, 2022 at 9:54 AM PDT

**Lumina Support**

To: Sofia Sedano, Tiffany Lazlo, Steve Page, Conor McDaniel, Corey Weissman

Hi Tiffany and Sofia,

These appear to be the credentials for the WP backend.

Sofa, the team will need credentials to the domain registrar which from our records looks to be GoDaddy.com

Hope this helps.

**Vera Khodasevich**  
Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010



View thread (8)

10 associations

Email - Re: Subdomain for IME from Tiffany Lazlo

Pin Copy link Oct 17, 2022 at 9:40 AM PDT

Tiffany Lazlo

To: Sofia Gerasi, Lumina Support, Steve Page, Connor McDaniel, Corey Williamson

Reply all Reply Forward Delete

Hi Sofia,

Hope you had a great weekend.

Thank you so much for the password updates, I'll send this over to the team and let you know if we have any questions.

Best,

Tiffany Lazlo

Giant Partners

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



GIANTPARTNERS

[Connect on LinkedIn](#)

View thread (8)

10 associations

Email - Re: Subdomain for IME from Tiffany Lazlo

Pin Copy link Oct 18, 2022 at 9:27 AM PDT

Tiffany Lazlo

To: Sofia Gerasi, Lumina Support, Steve Page, Yenu Liem, Corey McDaniel, Corey Williamson

Reply all Reply Forward Delete

Hi Vera and Sofia,

Happy Friday and thank you for the updates.

Our team is waiting on that information so as soon as we hear back from you we can move forward and will let you know if we have any other questions.

Have a wonderful weekend.

Best,

Tiffany Lazlo

Giant Partners

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



GIANTPARTNERS

[Connect on LinkedIn](#)

View thread (8)

10 associations

Email - Re: Subdomain for IME from Lumina Support

Pin Copy link Oct 18, 2022 at 9:29 AM PDT

Lumina Support

To: Steve Page, Sofia Gerasi, Yenu Liem, Tiffany Lazlo, Connor McDaniel

Reply all Reply Forward Delete

Hi Steve,

Thanks for sending this update!

This looks like an adjustment that needs to be made on the domain level. This is separate from the server and, if IME approves, full access can be granted to the domain registrar as this is their own unique account.

The credentials that we have for IME's domain registrar no longer work, I imagine the password may have been changed some time ago.

@Sofia Gerasi should be able to provide these credentials.

Please let us know if you need any further assistance.

Best,

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway # 1018

New York, NY 10010

332-444-3838

[lumina.nyc](http://lumina.nyc)



2020

SOCIAL IMPACT AWARD

Forbes

Business

Council



View thread (8)

10 associations

Email - Subdomain for IME from Steve Page

Pin Copy link Oct 13, 2022 at 1:28 PM PDT

Steve Page

To: Tiffany Lazlo, Sofia Gerasi, Lumina Support, Connor McDaniel

Reply all Reply Forward Delete

Open: 0 Click: 0

Hey Guys,

Our mistake. We changed the subdomain.

Please use this information below

Type: CNAME

Name: go

Value: [333649876316437a0d6dfo40cd7ac8d.unbouncepages.com](https://333649876316437a0d6dfo40cd7ac8d.unbouncepages.com)

TTL: 1 hour

Let us know if you have questions.

STEVEN PAGE



GIANT PARTNERS  
VP of Digital Strategy  
Office: (805) 267-1575 x146  
Text: (805) 664-1790

GIANT PARTNERS

Connect on LinkedIn

View Thread (8)

10 associations

September 2022

Email - Re: List of counties in and around Atlanta Georgia from Corey Weissman

Pin Copy link Sep 30, 2022 at 3:08 PM PST



Corey Weissman  
VP of Digital Strategy, Data Analyst  
Open 0 Close 0

Reply all Reply Forward Delete

Hi Yusef and Sofia,

Thank you for sending over the various geographies you want to target.

Are there any others or is this all of it including the other emails?

Please let me know.

Corey

COREY WEISSMAN  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (805) 267-1575 ext 126  
Direct: (805) 671-0421



GIANT PARTNERS

Connect on LinkedIn

View Thread (4)

5 associations

Email - GP - CRM User from Conor McDaniel

Pin Copy link Sep 30, 2022 at 9:10 AM PST



Conor McDaniel  
To Sofia Gotsis, Tiffany Luzzo, Corey Weissman  
Open 4 Close 0

Reply all Reply Forward Delete

Hey Sofia,

I hope all is well.

Can you provide me with the name of the CRM you are using as well as the login credentials?

With Tiffany being on holiday, you can direct any questions to me for the following week. Thank you!

Cheers,

CONOR MCDANIEL  
Director of Operations  
conor@giantpartners.com  
(805) 267-1575 x151  
Connect on LinkedIn



GIANT PARTNERS

View Thread (4)

7 associations

Email - Re: IHE Follow Up from Conor McDaniel

Pin Copy link Sep 30, 2022 at 8:19 AM PST



Conor McDaniel  
To Lumina Support, Tiffany Luzzo, Sofia Gotsis, Jimmy Page  
Sent

Reply all Reply Forward Delete

Hey Vera,

No worries at all.

When we have fully built the new website, we will send over instructions for you to host it.

Thank you, Vera!

Cheers,

CONOR MCDANIEL  
Director of Operations  
conor@giantpartners.com  
(805) 267-1575 x151  
Connect on LinkedIn



GIANT PARTNERS

On Fri, Sep 30, 2022 at 7:42 AM Lumina Support <support@lumina.nyc> wrote:

Hi Tiffany,

Sorry for the delayed reply here. I didn't realize you were looking for access to the server, the credentials that were shared were to the site's WordPress backend.

We won't be able to grant direct access to the server as it is shared with other client sites, but can certainly discuss with the team how to get the things done that you need done.

So, could you please elaborate on your exact needs for the site?

Thanks,

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010  
212.444.2458  
lumina.nyc



On Tue, Sep 27, 2022 at 7:53 PM Tiffany Luzzo <tiffany@giantpartners.com> wrote:

Our website developer is still having a hard time logging into the website hosting. Please see below and let us know if there is another login that we can use.

## Login

Sign in to your account to continue.

Login Details incorrect. Please try again.

Email Address

name@example.com

Password

Forgot Password?

Password

Login

☐ Remember Me

• Pub: 8N0Jw4WjF2wJ8R  
• Ufr: dJadmn@giantpartners.com

• Hosting/Content Service Name  
• Username: tiff@luminacompanions.com  
• Password: Pasa0027

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 5:55 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Thank you so much!

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 11:40 AM Lumina Support <support@luminamyc> wrote:  
Thanks Tiffany, hope you had a great weekend as well.

Just created a user for that email, temporary password:

• 03Uthwshgpx7HqW0caPhod

Just FYI for future needs, @Sofia (Saland) you're also able to create users on the site's backend via Users > Add New (screen shot)

Hope this helps!

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway #1015  
New York, NY 10010

212.444.2658

luminamyc



On Mon, Sep 26, 2022 at 2:26 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Hi Team,

Thank you so much, and I hope you had a great weekend.

Please let us know if you can add our [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com) email to the website so that our team members can have access as well.

Best Regards,

Tiffany Laszlo

Giant Partners

Account Manager

Office: (800) 267-1575 x 160

Text: (800) 828-3050

Email: tiffany@giantpartners.com



GIANTPARTNERS

Connect on LinkedIn

On Mon, Sep 26, 2022 at 8:24 AM Lumina Support <support@luminamyc> wrote:  
Hi Tiffany,

We just created a new user for you on the website, you should be getting an email from the site about this as well.

Just in case, I'm also posting credentials here:

[https://luminacompanions.com/admin\\_login](https://luminacompanions.com/admin_login)

User: your email

Temporary Password: 0jxNehUvFmb7SRdxuX6

Note: the password should be updated once you've logged into the backend.

Let us know if this all suffices or if you're in need of any further access or assistance.

Best,

Vera Khodasevich

Project Manager, Customer Service



1123 Broadway #1018  
New York, NY 10010  
(212) 444-2658  
lumin8.nyc



On Fri, Sep 23, 2022 at 2:29 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Hi Safa and Lumina Support,

Thank you all and happy Friday.

We are looking to access the website on our end so that we can make some edits. Please let us know what you need from our team to get this started.

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
Giant Partners  
Account Manager  
Office: (800) 287-1575 x 160  
Text: (805) 826-3050  
Email: tiffany@giantpartners.com



[Connect on LinkedIn](#)

On Fri, Sep 23, 2022 at 9:37 AM Safa Gerardi <safagerardi@gmail.com> wrote:  
Dear Tiffany, this is the Lumina Support email. they are very good at responding. If they please let me know and I will give them a call.

Please meet Tiffany from my marketing team, please give them any access they need for the website.

Safa Gerardi

On Thu, Sep 22, 2022 at 7:59 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Hi Safa,

The hosting / domain credentials did not work for the Lumina hosting. Is there an email to a representative that you were in contact with that we can reach out to?

- <https://www.luminahosting.com/>
- Hosting platform: Hosting/Domain Service Name (ex. GoDaddy)
- Username: info@imecompanions.com
- Password: Pupa0507!

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
Giant Partners  
Account Manager  
Office: (800) 287-1575 x 160  
Text: (805) 826-3050  
Email: tiffany@giantpartners.com



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 4:10 PM Safa Gerardi <safagerardi@gmail.com> wrote:  
Yes I'd like to meet before your vacation. Any day before the 28th is good for me. And we can keep the logo.

On Thu, Sep 22, 2022 at 7:20 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Hi Safa,

Thank you for the update.

We will work with what we have and see what we can do. Also just to confirm for the team would you like us to stick with the current logo and branding as we are staying with the IMC Companions name?



If you want us to do some variations for this current logo please let us know. Also please let me know what day works best for you this coming week to set up a short 30 min meeting. I will be out of town from the 30th-Oct 7th so just a week but I'd like to meet before I head out so we can go over everything.

Looking forward to hearing from you soon.

Best,

**Tiffany Laszlo**  
Giant Partners  
Account Manager  
Office: (800) 287-1575 x 160  
Text: (805) 826-3050  
Email: tiffany@giantpartners.com



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 3:32 PM Safa Gerardi <safagerardi@gmail.com> wrote:  
<https://youtu.be/vb8Qc-q-wmoQ>

On Thu, Sep 22, 2022 at 6:29 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Hi Safa,

Thank you for the information.

I'll have the team look into that and let you know if we have any questions. Also regarding the video from the website our team wanted to know if you had that video without music so that we can trim and splice it into smaller videos for new content.

If you are able to get that please add it to the google drive folder and let me know as that would be greatly appreciated.

Best,

**Tiffany Laszlo**  
Giant Partners  
Account Manager  
Office: (800) 287-1575 x 160  
Text: (805) 826-3050  
Email: tiffany@giantpartners.com



[Connect on LinkedIn](#)

On Thu, Sep 22, 2022 at 1:52 PM Safa Gerardi <safagerardi@gmail.com> wrote:  
Hi Tiffany, I believe it's word press and the web developer is hosting it. It's Lumina their phone number is 2124442658

On Thu, Sep 22, 2022 at 12:12 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:  
Hi Safa,

Hope your week is going well.

Our team wanted to know if you knew what hosting platform the current website was built on. We have tried the credentials from the document on a few different hosting platforms but they don't seem to be working so you think you could as the original developers that were working on the website?

Hosting platform: Hosting/Domain Service Name (ex. GoDaddy)

Username: Info@imecompanion.com

Password: Pupa0507?

Looking forward to hearing from you soon!

Best,

**Tiffany Lazzio**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: tiffany@giantpartners.com



**GIANTPARTNERS**

[Connect on LinkedIn](#)

On Fri, Sep 16, 2022 at 12:47 PM Tiffany Lazzio <tiffany@giantpartners.com> wrote:

Hi Sofia,

Hope this email finds you well.

Our team also wanted to know if we have your approval to use the recommended website template below. This will be the layout for the wilderness civil site that we'll be working on for you.

- <https://www.elegantthemes.com/examples/legal-shield/>

Looking forward to hearing your thoughts.

Best,

**Tiffany Lazzio**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: tiffany@giantpartners.com



**GIANTPARTNERS**

[Connect on LinkedIn](#)

On Fri, Sep 16, 2022 at 12:38 PM Tiffany Lazzio <tiffany@giantpartners.com> wrote:

Hi Sofia,

Happy Friday, how your week is going well.

Our team wanted to get your confirmation on which branding and logo we should use/create for the website and ad content. Should we use IME or DME Companions?

We also wanted to confirm the pricing on some of the services and the offers that we went over such as the \$175 per hour and the \$99 an hour for a basic report and if our team can use those as a specific call to action on ad creatives.

Also, please add any branding and marketing materials to the [Marketing Collateral](#) Google drive folder. Our team was asking if you had the raw video file for IME, the one on the website. We'd like to work with that content to make other ad variations.

For all the account access, please let me know a good time to set up a quick phone call to go over adding GP to the accounts. That way we don't run into any issues logging in with the provided credentials.

Looking forward to hearing from you soon.

Best,

**Tiffany Lazzio**

**Giant Partners**

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: tiffany@giantpartners.com



**GIANTPARTNERS**

[Connect on LinkedIn](#)

8 associations

✉ Email - Re: Zip codes for Harris county from Corey Weissman

Pin Copy link Sep 21, 2022 at 12:48 PM PDT

**Corey Weissman**

to Sofia Gelardi

1 Open 0 Closed 0

Hi Sofia,

I received those what about Georgia, New York, New Jersey and Pennsylvania?

We would want to submit all the geography at once if you can send those as well.

Please let me know.

Corey

**COREY WEISSMAN**

**Giant Partners**

Database Marketing Specialist

corey@giantpartners.com

Office: (805) 267-1575 ext 125

Direct: (805) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

View thread (8)

4 associations

✉ Email - Re: Zip codes for Harris county from Sofia Gelardi

Pin Copy link Sep 21, 2022 at 12:43 PM PDT

**Sofia Gelardi**

to Corey Weissman

Hi Corey, I sent you the counties and the zip codes in each county for Texas and Miami Florida.

View thread (8)

4 associations

✉ Email - Re: Zip codes for Harris county from Corey Weissman

Pin Copy link Sep 21, 2022 at 10:19 PM PDT

**Corey Weissman**

to Sofia Gelardi

1 Open 0 Closed 0

Hi Sofia,

Thank you for starting to send over the geography, I will wait until you send the geography for each state, so it looks like you're doing just zip codes? In other states you can also target counties, zip radius or the full state. Or you can just supply zip codes in each state that is fine too.

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania

- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta, Georgia
- Florida, Orlando to Miami 100-mile radius

This is what you sent previously and based on the zip codes so far we have:

TX, Harris county zip codes, Fort Bend, and Galveston zip codes.

FL- Miami Dade zip codes.

Let me know if you have any questions or need anything else.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

...

[View thread \(3\)](#)

4 associations

Email - GiantPartners- Geography Request for the Data for Marketing Efforts from Corey Weissman

[Pin](#) [Copy link](#) Sep 27, 2022 at 2:23 PM PDT



**Corey Weissman**  
to Sofia Gaidis -

Open: 1 / Close: 0

[Reply](#) [Forward](#) [Delete](#)

Hi Sofia,

I hope all is well with you, I know you have been very busy however I would like to try and get the data submitted this week if possible.

The only hold up is the geography, we need to know which areas you are willing to receive leads from based on zip codes, zip radius, county/ metro area, cities, states or nationwide.

This is what we have currently:

Previous Geography provided by SME:

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania
- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta, Georgia
- Florida, Orlando to Miami 100-mile radius

If you can please re-send this but confirm for each area what cities, counties, zip codes, zip radius, metro areas or full states you want to target?

For example:

1. Texas- Dallas and Harris County only
2. New York - Tri-State Area- Cities - New York, Long Island, etc.
3. New Jersey- Target Zip codes - xxxxx, xxxxx.
4. Georgia- Target Atlanta Metro Area.
5. Florida- Do a 100 mile zip radius from 32501- 100miles.

Please let me know if there are any questions or concerns as I recall you were going to send this to us last week on Friday.

We are greatly looking forward to receiving this and I believe Tiffany is trying to get a call scheduled with you ASAP as well.

Let me know your thoughts;

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

...

4 associations

Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 28, 2022 at 3:53 PM PDT



**Corey Weissman**  
to Sofia Gaidis -

Open: 1 / Close: 0

[Reply](#) [Forward](#) [Delete](#)

Hi Sofia,

I hope you had a great weekend! I wanted to check in and see if you and your husband are able to get me the geography this week for where you want to target in each state?

We are awaiting your response and hope to hear from you this week so we can get this data pulled.

Let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
corey@giantpartners.com  
Office: (855) 267-1575 ext 126  
Direct: (855) 871-0423



**GIANTPARTNERS**

[Connect on LinkedIn](#)

...

[View thread \(3\)](#)

4 associations

Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 28, 2022 at 3:53 PM PDT



**Corey Weissman**  
to Sofia Gaidis -

Open: 1 / Close: 0

[Reply](#) [Forward](#) [Delete](#)

Hi Sofia,

I hope all is well with you and your husband?

I wanted to check in and see if you have the geography ready for us for the data?

Please let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

[4 associations](#)

✉ Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 21, 2022 at 9:20 AM PDT

**Corey Weissman**  
To: Jody Gelsb...  
1 Open 1 Closed 0

[Reply](#) [Forward](#) [Delete](#)

Hi Sofia,

I hope all is well. I wanted to follow up and see if you have the geography ready for us?

Let me know if you have any questions!

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

[4 associations](#)

✉ Email - Re: GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 20, 2022 at 9:49 AM PDT

**Corey Weissman**  
To: Jody Gelsb...  
1 Open 2 Closed 0

[Reply](#) [Forward](#) [Delete](#)

Hi Sofia,

So I just met with Jeremy and our team and all we need is that geography from you so if you can send it today I can get the data going today, there is no need to rip on a call again for the data since as we have all the details from you unless there are any changes?

**PERSONAS: A (B2B) - Personal Injury Attorney Firms, B (B2B) - Workers Compensation Attorneys Primary Contacts: Attorneys, Office Managers, Clerks (IME, Calendar), Paralegals Decision Makers: Owners, Partners, Principal Officers Name: "Super Lawyers" - Lawyers that go to trial/court (NY State Trial Lawyer's Association), when lawyers settle out of court they do not value IME Compensations report/benefit, work with plaintiffs.**

Please send the geography for each state at your earliest convenience.

Please let me know if you have any questions or concerns.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

[4 associations](#)

✉ Email - GiantPartners- Follow up Data Request from Corey Weissman

[Pin](#) [Copy link](#) Sep 20, 2022 at 9:27 AM PDT

**Corey Weissman**  
To: Jody Gelsb...  
1 Open 3 Closed 0

[Reply](#) [Forward](#) [Delete](#)

Hi Sofia,

So here is what I have from our conversation regarding geography:

- Texas, Houston, Dallas
- Philadelphia, Pennsylvania
- New Jersey
- New York, New York City, Long Island, Westchester
- Atlanta Georgia
- Florida, Orlando to Miami 100-mile radius

If you can please re-send this but confirm for each area what cities, counties, zip codes, zip radius or full state you want to target? For example:

1. Texas- Dallas and Harris County only
2. New York - Tri-State Area- Cities - New York, Long Island, etc.
3. New Jersey- Target Zip codes - xxxxx, xxxxx;
4. Georgia- Target Atlanta Metro Area.
5. Florida- Do a 100 mile zip radius from .33551- 100miles.

If you can please have this for our call tomorrow morning that would be greatly appreciated.

Please let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**  
Giant Partners  
Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
Office: (800) 267-1575 ext 126  
Direct: (800) 871-0425



[Connect on LinkedIn](#)

1/1

[View thread \(3\)](#)

[4 associations](#)

✉ Email - GiantPartners- Data Overview Call from Corey Weissman

[Pin](#) [Copy link](#) Sep 20, 2022 at 9:02 AM PDT





View thread (3) 4 associations +

✉ Email - Re: GiantPartners/ListGiant Follow up- Partnership Link Inside from Safa Gelardi

Safa Gelardi  
To: Corey Weissman

Hi Corey, my website is not loading, I am having trouble getting into my website. Could it be you guys working on it? It's ok if it's you, I just want to make sure.

View thread (3) 4 associations +

✉ Email - GiantPartners Follow up- Thank you for your payment from Corey Weissman

Corey Weissman  
To: Safa Gelardi

Hi Safa:

We have received your first payment and thank you for making your 1st payment today. We are very confident in what we can achieve for you with our partnership together and we are looking forward to a long-term partnership with you!

One of our top account managers from our digital department will be reaching out tomorrow to send you the onboarding documents and set up the kick-off call for next week.

They will be one of your main points of contact regarding the digital side of our partnership, which includes getting approval on content, etc.

I will always be a part of this partnership and I will be responsible for pulling the data of who we are targeting and help you with any data lists you want to download. I will also always be here to answer your calls and help you as well.

We will discuss this more in-depth on our kick-off call and I am very excited to get the call scheduled ASAP!

If I don't talk to you tomorrow, I hope you have an amazing weekend and I look forward to seeing you in the kick-off call next week!

All my best,

Corey  
**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
 Office: (805) 247-1375 ext 126  
 Direct: (805) 871-0425

 Connect on LinkedIn

View thread (3) 4 associations +

✉ Email - GiantPartners/ListGiant Follow up- Partnership Link Inside from Corey Weissman

Corey Weissman  
To: Safa Gelardi

Hi Safa:

It was a pleasure speaking with you this morning and here is the link to create your password, view and approve the partnership and submit your 1st payment.

As soon as the payment is received, one of our Account Managers from our digital team will be sending you an onboarding document and also set up the kick-off call to go over all the details and get this partnership started ASAP!

Safa Gelardi ([safagelardi@gmail.com](mailto:safagelardi@gmail.com))  
Safa Gelardi,

Click the link below to confirm your email address for your new [payment.giant.com](https://payment.giant.com) account.

<https://payment.giant.com/index/confirm?step=3&id=418344829054653040a0d8b11211>

Please let me know if you have any questions or concerns.

We are greatly looking forward to working with you long-term and building a long-term mutually beneficial relationship!

All my best,

Corey  
**COREY WEISSMAN**  
 Giant Partners  
 Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)  
 Office: (805) 247-1375 ext 126  
 Direct: (805) 871-0425

 Connect on LinkedIn

View thread (3) 4 associations +

✉ Email - Giant Partners JME Companions Partnership Details from Jeremy Koeng

Jeremy Koeng  
To: Safa Gelardi, [eugene@jmeconsulting.com](mailto:eugene@jmeconsulting.com), Corey Weissman

Tracking data is not available for this email. Jeremy Koeng chose to log this email but not track it. [Learn more](#) [2]

Safa and Eugene,

Thank you for jumping on the screen share to discuss the **JME Companions Strategic Overview**. See relevant links below:

**Proposal:** <https://giantpartners.com/jmeccompanions092422.pdf> (Refresh browser to updates based on our discussion)

**Video Presentation:**  
(Raw video recording of the entire presentation and discussion)

**Contract Preview:**  
(Shared Google doc you can insert your comments on)

**Next steps:** Let us know when you are ready to have a follow up discussion. To get started and we will write up the formal contract in our platform. After confirmation you will receive a link from Giant Partners to create your account, accept terms and conditions, and set up your payment.

We look forward to working with you.

JEREMY KOENG  
 Giant Partners  
 President of Digital Strategy  
[jeremy@giantpartners.com](mailto:jeremy@giantpartners.com)  
 (805) 247-4376 ext 158

 7 associations +



- associations -

4 associations -

**From:** Estefania Sedano estefania@giantpartners.com  
**Subject:** Re: 025385  
**Date:** April 25, 2023 at 11:41  
**To:** Safa Gelardi safagelardi@gmail.com  
**Cc:** Corey Weissman corey@giantpartners.com

---

ES

Thank you!

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Tue, Apr 25, 2023 at 10:40 AM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** ListGiant/GiantPartners- Follow up- Checking in  
**Date:** February 9, 2024 at 16:44  
**To:** Safa Gelardi safagelardi@gmail.com

CW

Hi Safa,

Happy New Year! I hope all is well with you, I wanted to check in and see if you are still working with Eugene at IME? How's everything going on your side?

We hope to still be a resource for you for any targeted data lists or digital marketing services.

Please let me know your thoughts.

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

# GIANT PARTNERS

## KICKOFF CALL QUESTIONNAIRE

Q1: In your own words can you articulate your unique value proposition?

(What makes you different and superior to your competition)

We are nationwide (Only company nationwide)

There is no conflict of interest, we do not hire attorneys to advocate for your clients.

We NEVER turn down an IME Request. (Great Tagline)

We serve Supoenas if needed, we provide affidavits if needed, we can testify in court if needed

We are owner operated (Only one as of now), you will never be neglected, we are always reachable no matter what time or day (others are 9-5. They are 24/7). No matter what you are trying to reach us for whether it is for a report or last minute request, you will always be able to reach a decision maker

Although we are a third party, we consider ourselves an extension of the law firm, we represent our clients professionally

Our Companions are professionals, with careers in professional fields or came from professional fields.

Q2: In your own words, what are the top pain points that your product alleviates for customers?

Cheaper for attorneys, fee is a disbursement from the case. They just upfront the fee.

We serve as witnesses to dispute the biased doctors reports denying causation to the injury or the existence of an injury

We contact the client the day before to remind them of their appt. (a lot of times the client is unaware of their appt or forgot)

Uncertainty of whether the client attended, (they lie and say they did not show)

Uncertainty of what the client was asked to answer or do at the exam that may hurt the case

When your team is not available or calls out, IME Companions will always be there and reliable

(This is from Hurt911.com, it is a great tool for you to do research on the service)

While the doctors who perform the exams technically work for a company that is independent of the insurance company, there is substantial financial pressure on the hiring company which is passed on to the doctor performing the exam to please the insurance company by denying further treatment at an IME or to deny causation of the injury or the existence of the injury at a defense medical exam.

Some personal injury law firms allow clients to go to IME physicals alone which is a really bad idea. Most personal injury law firms will send someone, whether it be a lawyer, paralegal or another employee to accompany the client at the IME. Sending one of your employees is costly and much less effective than sending a trained representative from IME Companions. IME Companions representatives are well-trained and extremely effective at their job. Additionally, you'll get a written report of what happened at the physical.

Q3: Who are your primary competitors?

IME Watchdog,

IME Guards

Q4: What are your most high-performing call-to-actions for lead generation?

Super Lawyers - ideal audience - <https://www.superlawyers.com/>

CLE Meetings (NYSTLA, NYS academy of trial lawyers) there are associations in every state, they are all named something different)

Personal Injury Atty

Truck accident atty

Motorcycle attys

Construction Accidents (huge) they have the most need for us, their injuries are ususally very big and need to get the client the biggest settlement due to the client not being able to work again)

Hurt911 - ( <https://1800hurt911ga.com/>)

Q5: Where can we find examples of social proof that highlight your products/services?

(Examples: 1—Testimonials/Videos, 2—Customer Reviews, 3—Case Studies/Success Stories)

Email

IG/FB

Testimonials

Q6: What psychographic trends have you learned from your existing customer base?

(These buyer interests/associations help us to refine campaigns-based ad manager behavioral selects)

They all think the IME/DME are the defesne trying to minimize or dismiss their clients claim,

They know everything

They are very protective over their clients

Their mutual goal is to get the highest settlement

They believe the IME doctors are the devil

They are too busy to explain, there is no room for error

They will not accept apologies for errors, (they will go to the next company very fast)

They are paranoid and think their clients are being followed and will be integrated all the way to the IME

Q7: Who is the individual that will need to give approval for advertisements and communications before they go live? Safa Gelardi

Q8: Do you require any special contact fields for a lead to be passed into your CRM for the sales rep to follow? Need phone number and email

Do they use an IME service?

How much they pay?

Email & Phone

Contact person.

What they want in the reports?

Additional Instructions Needed:

# LinkedIn Messaging Guide

## Invitation Message

- A short message (300 characters) requesting to connect. You can opt to have an organic message for connecting or direct message why you want to connect with them.
  - You can put a personal touch by including their first name and business/company name
  - The shorter and generic, the better
- 
1. Hi Name, I'm looking to expand my network with lawyers who are motivated and passionate with what they do like yourself. Would you be open to connecting?  
Best, Safa
  2. Hi Name, I am \_\_\_\_\_ of IME Companions, I'm looking to expand my network with legal executives like yourself. Would you be open to connecting? Best,  
Name.

## Welcome Messages

- Aims to build a connection and trust between the prospect and you by simply engaging them in a conversation where it will lead them into knowing more of what your company can do for them.

It can be as simple as "Thank you for accepting my invitation to connect, how are you doing?" or as engaging as asking a couple of questions which will direct us to sending the direct information about the website on the follow up message or reply.



1.

Hi Name,

Thank you for accepting my invitation to connect and be part of your professional network.

I wanted to reach out and share how we can help you deal with your clientele's lawsuit.

IME Companions is a group of caring, ethical, proud and trained professionals who will oversee and document the Insurance Medical Exam to protect you from dishonest doctors who perform these exams. Too often, patients are wrongfully denied benefits due to inaccurate reports written by these doctors.

We will do the best job with the highest integrity and we are proud to protect your client.

Please let me know if this is something you would be interested in, I'd be happy to jump on a quick call to discuss.

Best regards,  
Safa

2.

Hi Name,

Thank you for accepting my invitation to connect.

As a Legal Executive, I know how things can be difficult when an injury lawsuit faces any unfairness from IME doctors that sometimes never look at the patient or barely examine them. The false and misleading IME reports purchased by insurance carriers can have a devastating effect upon injured workers and accident victims seeking justice.

That's why we're here to provide a much-needed service in the legal industry - we oversee and document the Insurance Medical Exam to protect patients who are seeking justice after an accident.

Would you be interested in learning more about what we do? I would be happy to answer any questions you may have.

Best regards,  
You\_Name

**3. This approach is more of trying to initiate an open ended conversation with the lead.**

Hi Name,

Thank you for accepting my invitation to connect and allowing me to join your professional network.

As a legal executive representing (type of attorney) clients.

I wanted to reach out and ask how you deal with IME claims for your clients that are dealing with unfairness from IME doctors that sometimes never look at the patient properly or barely examine them.

I look forward to your response.

Best regards,  
Your\_Name

**FOLLOW UP MESSAGE - This will depend on the response from the lead.**

**1.**

Hi Name,

As a lawyer, you know that an insurance medical exam can have a huge impact on your case. The IME Companions team of caring and trained professionals will oversee and

document the examination to protect your interests and ensure that a fair report is written.

We are the best at what we do, we stand by our professionalism and We NEVER turn down an IME Request.

Here are some of the clients we've worked with and their feedback towards IME Companions.

<https://imecompanions.com/firms/>

If these services are something you'd be interested in, would you be open to jump on a quick call anytime this week or next week to discuss?

Looking forward to your response.

Best regards,  
Your\_Name

**2.**

Hi Name,

I just wanted to circle back and see if you were interested in learning how IME Companions can help you stand against the wrong and dishonest reports written by doctors who perform IME exams.

IME Companions was created to take a stand against these dishonest doctors and we never allow your client to do any invasive testing. We are a group of caring and trained professionals who will oversee and document the IME exam to protect your interests.

Here are some of the clients we've worked with and their feedback towards IME Companions.

<https://imecompanions.com/firms/>

Know that We NEVER turn down an IME Request.

If this is something you'd be interested in, I would be happy to send a calendar invite to jump on a quick call to further discuss.

Looking forward to your response.

Best regards,  
Safa

## **FINAL FOLLOW UP**

Hello again, Name.

Reaching out to you one last time to discuss how IME Companions provides assistance with your injury cases.

We understand that it can be difficult to find time to accompany clients to the IME Exam. That's why we offer this service, so you can focus on other important tasks. We have a team of professionals who are available 24/7 to accompany your clients to the IME Exam.

In addition, we take HD video recordings of Workers' Compensation IMEs so you can have evidence if something goes wrong. We also prepare a report describing exactly what took place during the examination, how long the examination lasted, and any errors or lapses made by the examining physician.

I would love to know if this is something you are interested in.

I look forward to hearing from you. If I don't hear from you in the next couple of days, I'll assume that you're not interested and I would definitely understand.

Best regards,  
Safa

**From:** IME Legal Reps imelegalreps@gmail.com  
**Subject:** IME Legal Reps  
**Date:** March 19, 2024 at 17:51  
**To:** Corey Weissman corey@giantpartners.com, Estefania Sedano estefania@giantpartners.com

---



Hello, please help me restore the IME Legal Reps web page. my clients are not able to book. please help asap

Eugene

ES

**From:** Estefania Sedano estefania@giantpartners.com  
**Subject:** IME Legal Reps - Updates  
**Date:** April 18, 2023 at 15:13  
**To:** Safa Gelardi safagelardi@gmail.com  
**Cc:** Conor McDaniel conor@giantpartners.com, Corey Weissman corey@giantpartners.com, Manuel Cabrera manuel@giantpartners.com

---

Hey Safa,

Hope all is well!

I wanted to check in and send you an update on the work in progress - see below.

#### **Branding**

- Currently, the logo and colors mockups are in Quality Control, once we have approval from Scott I will be sending these.

#### **Website transfer**

- On Friday we moved the website development to the new domain: <https://imelegalreps.com/> and while we get the new branding approved and ready, we have removed any IME Companion logo or wording in the website.

#### **New Social & Paid Accounts**

- In order to set up the new Social Media and Paid accounts (such as Google Ads and LinkedIn), there are two ways to do it:
  - You can share the login information of the email you want to register all accounts.
  - Or we can schedule a meeting and do it together.

For the meeting, we can do

**Wednesday** at 10:00 am or 1:00 pm - 3:30 pm PDT

**Thursday** at 9:00 am - 1:00 pm PDT

Let me know what works for you!

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

CW

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** Re: GiantPartners Follow up- Update for IMELegalReps & Eugene  
**Date:** June 1, 2023 at 17:28  
**To:** Safa Gelardi safagelardi@gmail.com, IME Legal Reps imelegalreps@gmail.com, 4536250@bcc.hubspot.com

Hi Safa and Eugene,

I hope all is well with you, I wanted to check in and see if you have any updates regarding the marketing for IME Legal Reps?

We were waiting for your response on 5/15 regarding the court date you mentioned and we hope to hear from you soon!

Please let me know if there's a good day or time we can talk!

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

On Tue, May 30, 2023 at 2:12 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Safa,

I hope all is well with you, I wanted to check in and let you know we have been unsuccessful in reaching Eugene and we would like to know what's going on with IMELegalReps.

Can we start marketing? Can you have Eugene call us?

He hasn't picked up his phone and won't respond via email.

Please let me know ASAP.

Thanks,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist

[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425





[Connect on LinkedIn](#)



CW

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** Re: GiantPartners Follow up Marketing Efforts  
**Date:** June 9, 2023 at 11:50  
**To:** Safa Gelardi safagelardi@gmail.com, IME Legal Reps imelegalreps@gmail.com, 4536250@bcc.hubspot.com  
**Bcc:** 4536250@bcc.hubspot.com

---

Hi Eugene and Safa,

I hope all is well with you both, I wanted to see if you could please update us regarding the marketing efforts for IME Legal Reps?

Our team is awaiting an update from you since we started updating your website back in April.

If either of you could please update us that would be greatly appreciated.

Let me know if you have any questions or concerns!

All my best,

Corey

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

On Thu, Jun 8, 2023 at 2:07 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:  
Hi Eugene and Safa!

I hope all is well with you both, unfortunately I haven't been able to get a hold of either of you!

I wanted to check in regarding the court date in May that you mentioned you wanted to wait until that was over to begin the marketing efforts.

I have our team asking what is going on with this partnership.

Could either one of you please update me regarding when we can start marketing?

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

**From:** Corey Weissman corey@giantpartners.com  
**Subject:** Re: GiantPartners Follow up Marketing Efforts  
**Date:** June 9, 2023 at 11:50  
**To:** Safa Gelardi safagelardi@gmail.com, IME Legal Reps imelegalreps@gmail.com, 4536250@bcc.hubspot.com

CW

Hi Eugene and Safa,

I hope all is well with you both, I wanted to see if you could please update us regarding the marketing efforts for IME Legal Reps?

Our team is awaiting an update from you since we started updating your website back in April.

If either of you could please update us that would be greatly appreciated.

Let me know if you have any questions or concerns!

All my best,

Corey

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

On Thu, Jun 8, 2023 at 2:07 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hi Eugene and Safa!

I hope all is well with you both, unfortunately I haven't been able to get a hold of either of you!

I wanted to check in regarding the court date in May that you mentioned you wanted to wait until that was over to begin the marketing efforts.

I have our team asking what is going on with this partnership.

Could either one of you please update me regarding when we can start marketing?

All my best,

Corey

**COREY WEISSMAN**

Giant Partners, Database Marketing Advisor

Call: (805) 267-1575 ext 126

Text: (805) 625-9332

Email: [corey@giantpartners.com](mailto:corey@giantpartners.com)

Calendar: [Book meeting](#)

Linkedin: [Connect](#)

**From:** Conor McDaniel [conor@giantpartners.com](mailto:conor@giantpartners.com)  
**Subject:** Re: GP - IME Legal Reps  
**Date:** April 25, 2023 at 11:36  
**To:** IME Legal Reps [imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)

CM

Thank you, Safa - I will reach out in a couple minutes to confirm we are in.

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



On Tue, Apr 25, 2023 at 8:25 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:  
see credentials

Safa1125  
Pupa0507!!

On Tue, Apr 25, 2023 at 11:08 AM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:  
Hey Safa,

On my way into the office now - I see Estefania is working with you and Eugene on it now.

If there is an issue with the imecompanions domain, we will need access to the domain registrar (ex. GoDaddy) that [imecompanions.com](http://imecompanions.com) is in.

Can you send those login credentials over to Estefania?

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



On Tue, Apr 25, 2023 at 7:05 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

Conor, you have to fix this. People are associating imecompanions to imelegalreps and that is a significant issue. we will sue giant partners if we lose any clients because of this and it looks like we will. we are not imecompanions and the site should not be linked. this has to be fixed NOW

On Wed, Apr 12, 2023 at 1:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:  
Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](https://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)

**From:** Safa Gelardi safagelardi@gmail.com

**Subject:** Re: GP - IME Legal Reps

**Date:** April 14, 2023 at 12:03

**To:** Estefania Sedano estefania@giantpartners.com

**Cc:** Conor McDaniel conor@giantpartners.com, imelegalreps@gmail.com, Corey Weissman corey@giantpartners.com, Scott Owen scottowen@giantpartners.com, Steve Page stevep@giantpartners.com

please deactivate [imecompanions.com](https://imecompanions.com). it is very important that the domain [imecompanions.com](https://imecompanions.com) be deactivated asap. [imelegalreps.com](https://imelegalreps.com) has to go up asap and when a client books we should get an email to [info@imelegalreps.com](mailto:info@imelegalreps.com). It is imperative this is done asap

On Fri, Apr 14, 2023 at 11:59 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Safa,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Thu, Apr 13, 2023 at 8:12 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](https://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)

**From:** IME Legal Reps imelegalreps@gmail.com  
**Subject:** Re: GP - IME Legal Reps  
**Date:** April 19, 2023 at 12:25  
**To:** Estefania Sedano estefania@giantpartners.com  
**Cc:** Conor McDaniel conor@giantpartners.com, Corey Weissman corey@giantpartners.com, Scott Owen scottowen@giantpartners.com, Steve Page stevep@giantpartners.com

The phone number to my business is 800-409-9921, please update as well.

On Wed, Apr 19, 2023 at 12:02 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Eugene,

Nice to e-meet you!

I'm sorry to hear about Safa, but looking forward to working with you! I saw your missed call but my phone is currently updating the software.

If it works for you we can meet today, I'm pretty open after 1:30 pm PDT.

Regarding the Brand mockups, let me check in with the design team. I'm aware it's in QC, maybe they needed a couple of tweaks before sharing.

As for the website, will proceed to remove the video and double check there isn't anything related to IME Companions anymore.

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 19, 2023 at 9:23 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

Hello Everyone, This is Eugene Liddy, I am the owner of IME Legal Reps. Please remove the video about IME Companions and please get the new mock ups ready as soon as possible. we need this website up as IME Legal reps vision immediately. Please communicate only with me as Safa is no longer involved.

Eugene Liddy

On Fri, Apr 14, 2023 at 12:44 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Safa,

The team needs to get login approval. They have sent a Godaddy code to your email, could you please provide it?

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:15 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Safa,

Currently working on it! Let me check in with the team.

Cheers,

Estefania Sedano

[Giant Partners](#)

[Giant Partners](#)

Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:03 AM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

please deactivate [imecompanions.com](https://imecompanions.com). it is very important that the domain [imecompanions.com](https://imecompanions.com) be deactivated asap. [imelegalreps.com](https://imelegalreps.com) has to go up asap and when a client books we should get an email to [info@imelegalreps.com](mailto:info@imelegalreps.com). It is imperative this is done asap

On Fri, Apr 14, 2023 at 11:59 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Safa,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Thu, Apr 13, 2023 at 8:12 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](https://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!



Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)

**From:** IME Legal Reps imelegalreps@gmail.com  
**Subject:** Re: GP - IME Legal Reps  
**Date:** April 19, 2023 at 12:25  
**To:** Estefania Sedano estefania@giantpartners.com  
**Cc:** Conor McDaniel conor@giantpartners.com, Corey Weissman corey@giantpartners.com, Scott Owen scottowen@giantpartners.com, Steve Page stevep@giantpartners.com

The phone number to my business is 800-409-9921, please update as well.

On Wed, Apr 19, 2023 at 12:02 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Eugene,

Nice to e-meet you!

I'm sorry to hear about Safa, but looking forward to working with you! I saw your missed call but my phone is currently updating the software.

If it works for you we can meet today, I'm pretty open after 1:30 pm PDT.

Regarding the Brand mockups, let me check in with the design team. I'm aware it's in QC, maybe they needed a couple of tweaks before sharing.

As for the website, will proceed to remove the video and double check there isn't anything related to IME Companions anymore.

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 19, 2023 at 9:23 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

Hello Everyone, This is Eugene Liddy, I am the owner of IME Legal Reps. Please remove the video about IME Companions and please get the new mock ups ready as soon as possible. we need this website up as IME Legal reps vision immediately. Please communicate only with me as Safa is no longer involved.

Eugene Liddy

On Fri, Apr 14, 2023 at 12:44 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Safa,

The team needs to get login approval. They have sent a Godaddy code to your email, could you please provide it?

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:15 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Safa,

Currently working on it! Let me check in with the team.

Cheers,

Estefania Sedano

[Giant Partners](#)

[Giant Partners](#)

Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:03 AM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

please deactivate [imecompanions.com](http://imecompanions.com). it is very important that the domain [imecompanions.com](http://imecompanions.com) be deactivated asap. [imelegalreps.com](http://imelegalreps.com) has to go up asap and when a client books we should get an email to [info@imelegalreps.com](mailto:info@imelegalreps.com). It is imperative this is done asap

On Fri, Apr 14, 2023 at 11:59 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Safa,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Thu, Apr 13, 2023 at 8:12 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](http://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)

**From:** Conor McDaniel [conor@giantpartners.com](mailto:conor@giantpartners.com)  
**Subject:** Re: GP - IME Legal Reps  
**Date:** April 25, 2023 at 11:36  
**To:** IME Legal Reps [imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)  
**Bcc:** [corey@giantpartners.com](mailto:corey@giantpartners.com)

CM

Thank you, Safa - I will reach out in a couple minutes to confirm we are in.

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



On Tue, Apr 25, 2023 at 8:25 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:  
see credentials

Safa1125  
Pupa0507!!

On Tue, Apr 25, 2023 at 11:08 AM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:  
Hey Safa,

On my way into the office now - I see Estefania is working with you and Eugene on it now.

If there is an issue with the imecompanions domain, we will need access to the domain registrar (ex. GoDaddy) that [imecompanions.com](http://imecompanions.com) is in.

Can you send those login credentials over to Estefania?

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



On Tue, Apr 25, 2023 at 7:05 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

Conor, you have to fix this. People are associating imecompanions to imelegalreps and that is a significant issue. we will sue giant partners if we lose any clients because of this and it looks like we will. we are not imecompanions and the site should not be linked. this has to be fixed NOW

On Wed, Apr 12, 2023 at 1:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:  
Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](https://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)

**From:** IME Legal Reps imelegalreps@gmail.com  
**Subject:** Re: GP - IME Legal Reps  
**Date:** April 19, 2023 at 10:23  
**To:** Estefania Sedano estefania@giantpartners.com  
**Cc:** Conor McDaniel conor@giantpartners.com, Corey Weissman corey@giantpartners.com, Scott Owen scottowen@giantpartners.com, Steve Page stevep@giantpartners.com

Hello Everyone, This is Eugene Liddy, I am the owner of IME Legal Reps. Please remove the video about IME Companions and please get the new mock ups ready as soon as possible. we need this website up as IME Legal reps vision immediately. Please communicate only with me as Safa is no longer involved.

Eugene Liddy

On Fri, Apr 14, 2023 at 12:44 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Safa,

The team needs to get login approval. They have sent a Godaddy code to your email, could you please provide it?

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:15 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Safa,

Currently working on it! Let me check in with the team.

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Fri, Apr 14, 2023 at 11:03 AM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:

please deactivate [imecompanions.com](http://imecompanions.com). it is very important that the domain [imecompanions.com](http://imecompanions.com) be deactivated asap. [imelegalreps.com](http://imelegalreps.com) has to go up asap and when a client books we should get an email to [info@imelegalreps.com](mailto:info@imelegalreps.com). It is imperative this is done asap

On Fri, Apr 14, 2023 at 11:59 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Good morning Safa,

Happy Friday!

Got it. We'll work on a couple of mockups for your review.

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Thu, Apr 13, 2023 at 8:12 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:  
Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:  
Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:  
Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](http://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



**From:** Safa Gelardi safagelardi@gmail.com

**Subject:** Re: GP - IME Legal Reps

**Date:** April 13, 2023 at 21:12

**To:** Estefania Sedano estefania@giantpartners.com

**Cc:** Conor McDaniel conor@giantpartners.com, imelegalreps@gmail.com, Corey Weissman corey@giantpartners.com, Scott Owen scottowen@giantpartners.com, Steve Page stevep@giantpartners.com

Let's change it up a little bit

On Thu, Apr 13, 2023, 5:43 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hi Safa,

I'm super excited to start working with you! I heard so many good things from the team that I'm ready to start rolling the ball.

Circling back on Conor's question, for IME Sales Rep branding can we use the same colors as IME Companions?

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Wed, Apr 12, 2023 at 12:53 PM Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)> wrote:

Hey Safa,

I hope all has been well! It's great to have you back on board.

I want to introduce you to your Account Manager, Estefania Sedano! You're in excellent hands with Estefania.

I've been brought up to speed and notified that the immediate high-priority item is to develop a new logo and transfer the IME Companions website over to the [imelegalreps.com](http://imelegalreps.com) domain and rebrand for IME Legal Reps.

A couple of questions for you:

- The GoDaddy Credentials you provided to Corey are incorrect. Can you check on those and send over the updated credentials?
- For IME Legal Reps, can we use the same colors as IME Companions?

Thank you, Safa!

Cheers,


**CONOR MCDANIEL**

Director of Operations

[conor@giantpartners.com](mailto:conor@giantpartners.com)

(805) 267-1575 x151

[Connect on LinkedIn](#)

**From:** Safa Gelardi [sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)   
**Subject:** Re: IME HubSpot  
**Date:** January 25, 2023 at 15:25  
**To:** Tiffany Laszlo [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com), [safagelardi@gmail.com](mailto:safagelardi@gmail.com)  
**Cc:** Conor McDaniel [conor@giantpartners.com](mailto:conor@giantpartners.com), Corey Weissman [corey@giantpartners.com](mailto:corey@giantpartners.com)

Hi Tiffany, I'm sorry I am not available today.

Get [Outlook for iOS](#)

---

**From:** Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>  
**Sent:** Wednesday, January 25, 2023 3:10:13 PM  
**To:** [safagelardi@gmail.com](mailto:safagelardi@gmail.com) <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)>; Safa Gelardi <[sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)>  
**Cc:** Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>  
**Subject:** Re: IME HubSpot

Hi Safa,

Hope your week is going well.

Please let me know if you are available for our meeting today. I'd love to hear about any lead feedback you have for the team as well as any copy updates you were able to provide on the website.

Currently, we are building out a bigger database for you based on the locations we went over in our meeting last week. I also have the team working on Us vs them tactic ads for both personas and should have updates on those by next week.

The team had also asked if you had any testimonials or reviews that we could use for any future content.

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Wed, Jan 18, 2023 at 2:22 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Safa,

Again thank you so much for your time today.

As we discussed you will need to send us some of the testimonials and reviews as well as the percentages and stats on how successful your company and services have been for all the clients you've worked with.

If you have any contacts that you want us to work on reaching out to or building more data lists on please let me know what those are. Currently, we are working on getting new data based on your feedback from today and our last meeting.

Our paid media team will be moving forward with the current updated assets and creatives we have based on your edits from last

week. We are also going to be working on developing new assets based on Us vs them style ads as this is the type of tactic you have been mentioning on our calls and it is a great tactic to use and test out. The only thing we may need from you are some bullet points on differences or things that make your team and services different from the rest. Having the top 5 points would be great.

As for the HubSpot account please continue to follow up with leads and make sure that you fill in and save the lead status so our team can keep track of the lead quality and know how to improve on the campaigns. The paid media team will also update any categories we can in LinkedIn to make sure we are getting the best results moving forward.

- [HubSpot](#)

Please see the PageProof link below for the website. If you want to go in and edit some of the copy, it is really easy to use the editing tool on the left. The pencil will turn red and you can take your mouse cursor and go over the sections you want to leave notes on. You will see a box pop out on the right side. Once you add the note in the box make sure you click on the green arrow to save the comment for the team to go over and update.

- PageProof - <https://app.pageproof.com/proof/web/PHI1ALWFR98T2JDA?referrer=share>

The screenshot displays the IME Companions website at the URL <https://imecompanions.com/>. A PageProof editing interface is overlaid on the left side of the page. This interface includes a 'Red pen' section with instructions: 'Click to add a pin.', 'Click + drag to draw a line.', and 'Click + drag diagonally to draw a box.' Below these instructions are three circular icons: a pencil, a red pencil, and a document with a checkmark. The website header features the 'IME COMPANIONS' logo and the text 'Why C'. The main content area contains the text: 'IME's and the doctors are anything but in deliberately pick the doctors they want to p report does not negate the clients injury clai will not be referred cases to review. We will'. A comment box is visible on the right side of the page, showing a comment from 'tiffany@giantpartners.com' posted 'AN HOUR AGO'. The comment text is '#1 Add Notes on Copy that needs to be edited'. Below the comment is a text input field with the placeholder 'Write a reply' and icons for emojis, attachments, and a send button. A 'CLOSE' button is located at the bottom right of the comment box.

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Wed, Jan 18, 2023 at 12:46 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Safa,

Thank you for meeting with me today.

Please see the IME HubSpot link below <https://app.hubspot.com/contacts/6898662/objects/0-1/views/all/list>. you will need to log in and go to the contacts page on the top left of the website.

Contacts 40 records				
All contacts My contacts Unassigned contacts + Add view (3/5) All view				
Contact owner Create date Last activity date Lead status All filters (0) Save view				
Search name, phone, Actions				
PRIMARY COMPANY	LAST ACTIVITY DATE (PST)	LEAD STATUS	CREATE DATE (PST)	UTM_SOURCE
---	---	---	Today at 9:41 AM	adwords
---	---	---	Jan 12, 2023	adwords
---	---	Connected	Jan 3, 2023	linkedin
---	---	Unqualified	Dec 30, 2022	adwords
---	---	---	Dec 28, 2022	linkedin
---	---	Connected	Dec 26, 2022	linkedin
---	---	Connected	Dec 26, 2022	linkedin

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)





[Connect on LinkedIn](#)

**From:** Safa Gelardi safagelardi@gmail.com  
**Subject:** Re: IME HubSpot  
**Date:** January 30, 2023 at 18:39  
**To:** Tiffany Laszlo tiffany@giantpartners.com  
**Cc:** Conor McDaniel conor@giantpartners.com, Corey Weissman corey@giantpartners.com

Looking forward to it too!

On Mon, Jan 30, 2023 at 6:38 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:

Thank you Safa,

I'll let the team know that all of the items above are approved and we'll get to work on setting up the deployment.

Looking forward to meeting with you tomorrow.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Mon, Jan 30, 2023 at 3:15 PM Safa Gelardi <safagelardi@gmail.com> wrote:

This is approved

On Mon, Jan 30, 2023 at 6:07 PM Tiffany Laszlo <tiffany@giantpartners.com> wrote:

Hi Safa,

Hope you had a great weekend.

Please see the items below that are pending your copy approvals.

- [IME Cold Email](#)
- [IME LP](#)
- [IME TY](#)
- [IME Email Campaign Sequence](#)

Also as a reminder, our meeting will be tomorrow.

IME Meeting:

Tuesday, January 31 • 10:00 – 10:30am PST

Google Meet joining info

**Video call link:** <https://meet.google.com/fvp-goix-anw>

Or dial: (US) +1 662-450-4178 PIN: 471 742 888#

More phone numbers: <https://tel.meet/fvp-goix-anw?pin=9059076056111>

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Fri, Jan 27, 2023 at 12:18 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Perfect that sounds great.

Please see the link below for Tuesday the 31st.  
IME Meeting  
Tuesday, January 31 - 10:00 – 10:30am PST  
Google Meet joining info  
Video call link: <https://meet.google.com/fvp-goix-anw>  
Or dial: (US) +1 662-450-4178 PIN: 471 742 888#  
More phone numbers: <https://tel.meet/fvp-goix-anw?pin=9059076056111>

When you have time please go over the email copy for both the segmented emails and the cold email.

Have a wonderful weekend.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Fri, Jan 27, 2023 at 10:52 AM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:  
ok I can do that

On Fri, Jan 27, 2023 at 1:19 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Happy Friday!

This coming week I can do Tuesday at 10am PST, I think that would be about 1pm EST.

Please let me know if Tuesday the 31st at 10am PST works for you.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Jan 26, 2023 at 4:35 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:  
Does tomorrow work for you, 2pm EST?

On Thu, Jan 26, 2023 at 7:33 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Thank you again for your time today.

If you want to set up a short meeting earlier next week please let me know so we can go over the email copy for the segments and the LP and TY name

and the page.

Also, we have the newly updated email for the cold email campaign as well. Please let us know if this is approved.

- [IME - EM4](#)

Hope to hear from you soon.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Jan 26, 2023 at 1:39 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Safa,

Thank you for jumping on the call real quick today I know you have a lot on your plate.

Please go over the copy and add in your notes as needed, you can highlight the notes you add in so they stand out on the google document.

Also, let us know about the LP and TY page links and if we need to make any changes there to the copy as well.

If you can follow up with the lead in HubSpot to let us know if they are good or bad that would be great as well.

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Thu, Jan 26, 2023 at 1:23 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Ok, thanks Safa jump on when you can. You can join the link to the call, I'm here.

Also now, I will only have about 20min till my next call today. Please let me know if that works for you.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)







[Connect on LinkedIn](#)

On Thu, Jan 26, 2023 at 1:20 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:  
im ready to take the call

On Thu, Jan 26, 2023 at 4:15 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Hope you're doing well.

Our meeting is set up for today, just wanted to check in to see if you were still available. If not we can work on setting up a meeting for earlier next week.

IME meeting

**Thursday, January 26 · 1:00 – 1:30pm PST**

Google Meet joining info

Video call link: <https://meet.google.com/ojp-pzzm-rsv>

Or dial: (US) +1 219-301-2227 PIN: 273 879 398#

More phone numbers: <https://tel.meet/ojp-pzzm-rsv?pin=8074404832697>

I'd like to go over and get your final approval on some of the copy edits we discussed on the IME Companions 2nd Email Campaign Sequence.

- [IME Companions 2nd Email Campaign Sequence](#)

We also wanted to follow up on the copy edits we did for the LP and TY pages.

- LP: <https://go.imecompanions.com/book/>
- TY: <https://go.imecompanions.com/thank-you/>

Regarding your campaigns, we added 2 new forms to your Meta campaigns and have already captured 4 leads at a CPL: of \$40 per lead. We are working on updating and optimizing to improve the overall CPL. Please let us know if you have any lead feedback for us.

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Wed, Jan 25, 2023 at 12:40 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Thank you for the update.

Our meeting was moved to tomorrow at 1:00PM PST.

IME meeting

**Thursday, January 26 · 1:00 – 1:30pm**

Google Meet joining info

Video call link: <https://meet.google.com/ojp-pzzm-rsv>

Or dial: (US) +1 219-301-2227 PIN: 273 879 398#

More phone numbers: <https://tel.meet/ojp-pzzm-rsv?pin=8074404832697>

See you tomorrow.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Wed, Jan 25, 2023 at 12:38 PM Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)> wrote:  
Let's do 1pm pst tomorrow

On Wed, Jan 25, 2023 at 3:37 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Let me know what you decided about the next meeting time and date.

Also please go over the emails here and let us know if we have your approval.

- [IME Companions 2nd Email Campaign Sequence](#)

The paid media team also wanted to update you regarding Meta/FB. It looks like we added some new form fills and have 2 new leads. Please follow up and let us know what you think of the lead quality.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Wed, Jan 25, 2023 at 12:30 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:  
Hi Safa,

Thank you for the update.

Did you want to move this meeting to tomorrow or next week? We can try to do 12:30pm PST or 1:00pm PST for tomorrow. Or we can just do a normal meeting follow-up for next week same day and time?

Let me know what works best.

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Wed, Jan 25, 2023 at 12:25 PM Safa Gelardi <[sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)> wrote:  
Hi Tiffany, I'm sorry I am not available today.

Get [Outlook for iOS](#)

---

**From:** Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)>  
**Sent:** Wednesday, January 25, 2023 3:10:13 PM  
**To:** [safagelardi@gmail.com](mailto:safagelardi@gmail.com) <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)>; Safa Gelardi <[sgelardi@imecompanions.com](mailto:sgelardi@imecompanions.com)>  
**Cc:** Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>; Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>  
**Subject:** Re: IME HubSpot

Hi Safa,

Hope your week is going well.

Please let me know if you are available for our meeting today. I'd love to hear about any lead feedback you have for the team as well as any copy updates you were able to provide on the website.

Currently, we are building out a bigger database for you based on the locations we went over in our meeting last week. I also have the team working on Us vs them tactic ads for both personas and should have updates on those by next week.

The team had also asked if you had any testimonials or reviews that we could use for any future content.

Looking forward to hearing from you soon.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Wed, Jan 18, 2023 at 2:22 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Safa,

Again thank you so much for your time today.

As we discussed you will need to send us some of the testimonials and reviews as well as the percentages and stats on how successful your company and services have been for all the clients you've worked with.

If you have any contacts that you want us to work on reaching out to or building more data lists on please let me know what those are. Currently, we are working on getting new data based on your feedback from today and our last meeting.

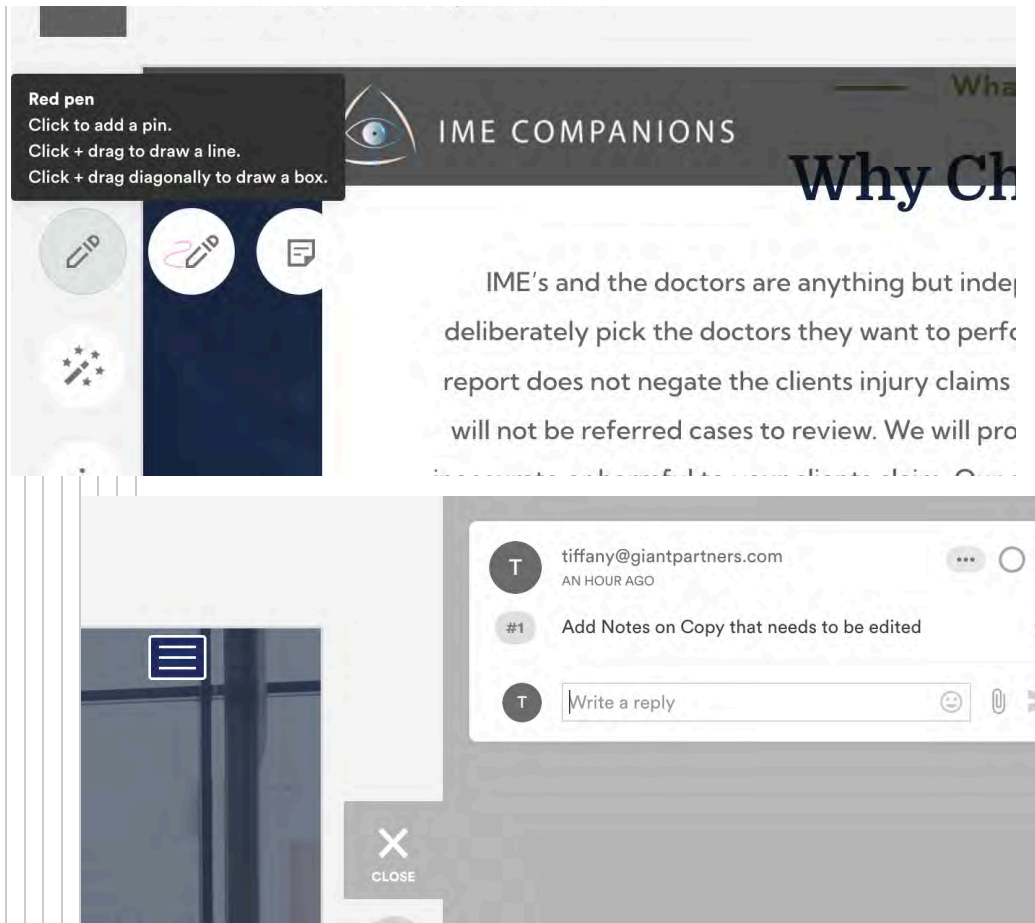
Our paid media team will be moving forward with the current updated assets and creatives we have based on your edits from last week. We are also going to be working on developing new assets based on Us vs them style ads as this is the type of tactic you have been mentioning on our calls and it is a great tactic to use and test out. The only thing we may need from you are some bullet points on differences or things that make your team and services different from the rest. Having the top 5 points would be great.

As for the HubSpot account please continue to follow up with leads and make sure that you fill in and save the lead status so our team can keep track of the lead quality and know how to improve on the campaigns. The paid media team will also update any categories we can in LinkedIn to make sure we are getting the best results moving forward.

- [HubSpot](#)

Please see the PageProof link below for the website. If you want to go in and edit some of the copy, it is really easy to use the editing tool on the left. The pencil will turn red and you can take your mouse cursor and go over the sections you want to leave notes on. You will see a box pop out on the right side. Once you add the note in the box make sure you click on the green arrow to save the comment for the team to go over and update.

- PageProof - <https://app.pageproof.com/proof/web/PHI1ALWFR98T2JDA?referrer=share>



Looking forward to hearing from you soon.

Best,

Tiffany Laszlo  
[Giant Partners](#)  
Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



[Connect on LinkedIn](#)

On Wed, Jan 18, 2023 at 12:46 PM Tiffany Laszlo <[tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)> wrote:

Hi Safa,

Thank you for meeting with me today.

Please see the IME HubSpot link below <https://app.hubspot.com/contacts/6898662/objects/0-1/views/all/list>. you will need to log in and go to the contacts page on the top left of the website.

Contacts

40 records

Data Quality

Actions

Import

Create contact

All contacts

My contacts

Unassigned contacts

+ Add view (3/5)

All views

Contact owner

Create date

Last activity date

Lead status

All filters (0)

Save view

Search name, phone

Actions

PRIMARY COMPANY	LAST ACTIVITY DATE (PST)	LEAD STATUS	CREATE DATE (PST)	UTM_SOURCE
			Today at 9:41 AM	adwords
			Jan 12, 2023	adwords
		Connected	Jan 3, 2023	linkedin
		Unqualified	Dec 30, 2022	adwords
			Dec 28, 2022	linkedin
		Connected	Dec 26, 2022	linkedin
		Connected	Dec 26, 2022	linkedin

Prev

1

Next

50 per page

Best,

Tiffany Laszlo


[Giant Partners](#)

Account Manager

Office: (805) 267-1575 x 160

Text: (805) 826-3050

Email: [tiffany@giantpartners.com](mailto:tiffany@giantpartners.com)



**GIANTPARTNERS**

[Connect on LinkedIn](#)

**From:** Estefania Sedano [estefania@giantpartners.com](mailto:estefania@giantpartners.com) 

**Subject:** Re: IME Legal Reps - Branding Hand Off

**Date:** April 25, 2023 at 10:12

**To:** IME Legal Reps [imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)

**Cc:** Conor McDaniel [conor@rankgiant.com](mailto:conor@rankgiant.com), Corey Weissman [corey@giantpartners.com](mailto:corey@giantpartners.com), Dan Millet [danmillet@giantpartners.com](mailto:danmillet@giantpartners.com)

ES

Hey Eugene!

I see, can you please share a screen video to see the issue?

Thank you so much.

On Tue 25 Apr 2023 at 9:11 IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:  
why would it go to [imelegalreps.com](http://imelegalreps.com) they should not be affiliated. it should be like a brand new site

On Tue, Apr 25, 2023 at 10:09 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:  
this is a legal matter fix this now

On Tue, Apr 25, 2023 at 10:08 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:  
try another computer, it happens clients are seeing it, you are doing something wrong. i can not work with a company like this

On Tue, Apr 25, 2023 at 10:06 AM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:  
Good morning Eugene!

I checked the domain [imecompanions.com](http://imecompanions.com) and it doesn't redirect to the new site. Most likely you and this person need to clean cookies and captcha - some browser, like Chrome, tend to store users' information. See screenshot below.

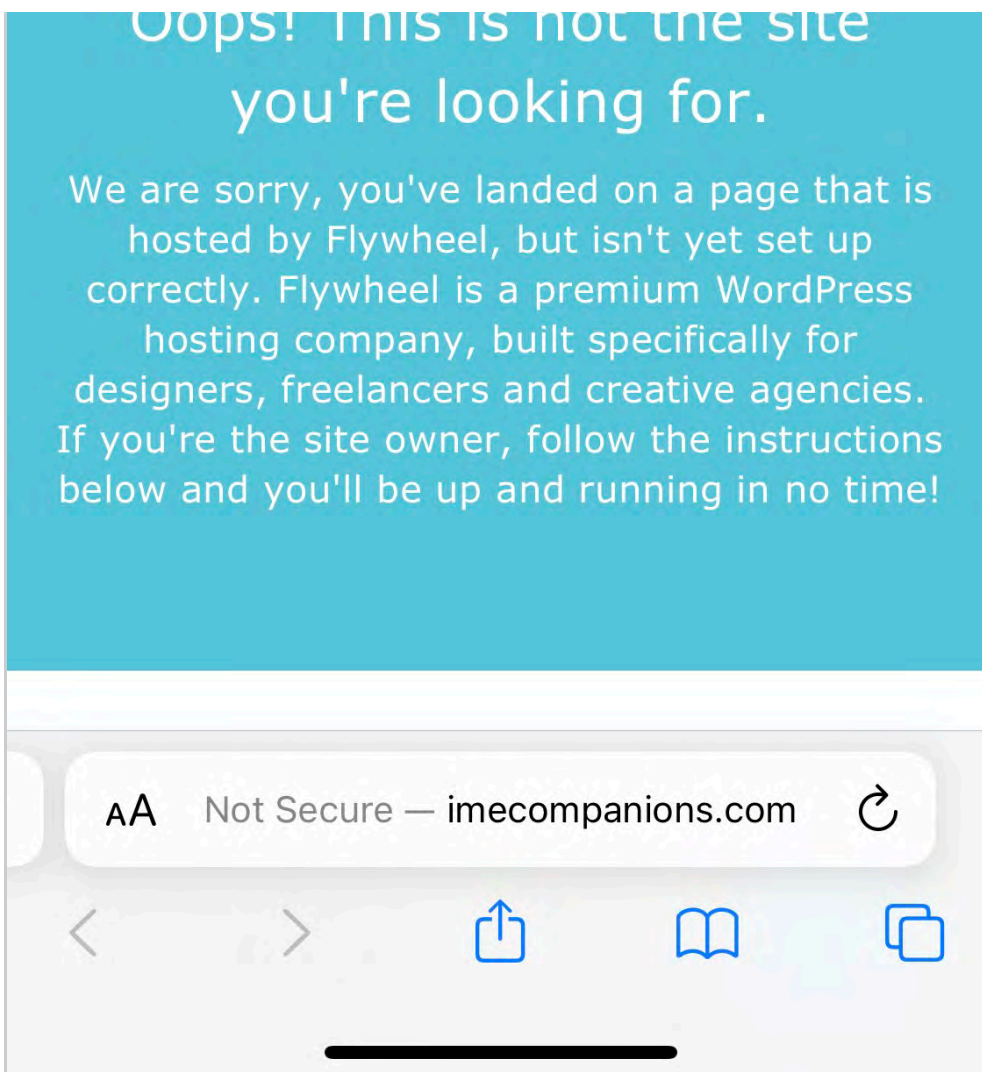
9:01

◀ Gmail



FLYWHEEL





If you don't mind, can you proceed to clean cookies and captcha and then try again? If you see the same issue, please proceed to record your screen and share with me.

Cheers,

Estefania

On Tue 25 Apr 2023 at 8:57 IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:  
people are stating that when someone goes to [imecompanions.com](http://imecompanions.com) it goes to [imelegalreps.com](http://imelegalreps.com). how can we fix this. this is looking like it belongs to [imecompanions.com](http://imecompanions.com) we are losing clients. please fix this asap

On Mon, Apr 24, 2023 at 4:45 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:  
Hey Eugene,

As part of the Branding project, we have compiled the following elements in our shared Drive.

- Logo
- Fonts
- Imagery - for ads and web

Here's the link to access: <https://drive.google.com/drive/folders/1kivdvJrdIOlvm6QP4zIZ5PUCWU5GNLpW>

Regarding the website, we have it ready! I have sent a PageProof for you to add comments if needed, here's the link: <https://app.pageproof.com/proof/web/P7PBPHYCDA1G88O1?referrer=share>

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

--

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

--

Cheers,

Estefania Sedano

[Giant Partners](#)  
Account Manager  
(805) 262 7994 or  
(805) 267-1575 ext.130  
[estefania@giantpartners.com](mailto:estefania@giantpartners.com)



ES

**From:** Estefania Sedano estefania@giantpartners.com  
**Subject:** Re: IME Legal Reps <> GP - Account Access Meeting  
**Date:** April 25, 2023 at 16:19

**To:** IME Legal Reps imelegalreps@gmail.com

**Cc:** Corey Weissman corey@giantpartners.com, Conor McDaniel conor@giantpartners.com, Dan Millet danmillet@giantpartners.com

Hey Eugene,

Looks like something conflicted with your agenda, as I waited for 15 minutes but there was no show - I also tried to call you but no answer.

Would you be available tomorrow or Thursday?

It will be great if we can get the accounts created and shared this week, so we don't have any roadblocks by the time we can run ads.

We have the brand ready, the email #1 design is in progress, and also the website - which by the way, please review, there are no more redirections from [imecompanions.com](https://imecompanions.com) to any other website.

Looking forward to your answer!

Cheers,

Estefania Sedano

[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Tue, Apr 25, 2023 at 3:02 PM Estefania Sedano <[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Eugene,

Please join our meeting with this link <https://meet.google.com/oen-czog-dew>

Cheers,

Estefania Sedano


[Giant Partners](#)

Account Manager

(805) 262 7994 or

(805) 267-1575 ext.130

[estefania@giantpartners.com](mailto:estefania@giantpartners.com)

**From:** Scott Owen [scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)   
**Subject:** Re: IME Legal Reps - Website Review  
**Date:** June 27, 2023 at 17:54  
**To:** Sheldon Katz [sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)  
**Cc:** Corey Weissman [corey@giantpartners.com](mailto:corey@giantpartners.com)

SO

Sure thing.

**SCOTT OWEN**

[Giant Partners](#)

Creative Director

(805) 267-1575 ext 124

[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)



On Jun 27, 2023, at 4:54 PM, Sheldon Katz <[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)> wrote:

Yes, please. Can you also cc Corey?

Thank you very much!

**SHELDON KATZ**

COO

[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)

Office: (805) 267-1575

LinkedIn: [Let's Connect](#)

---

**From:** Scott Owen <[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)>

**Sent:** Tuesday, June 27, 2023 2:40 PM

**To:** Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>; Sheldon Katz <[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)>

**Subject:** Re: IME Legal Reps - Website Review

I like it. Shall I send?

Sent from my iPhone

| On Jun 27, 2023, at 4:35 PM, Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

| I agree and like the email. Good to go for me.

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

| On Tue, Jun 27, 2023 at 2:22 PM, Sheldon Katz <[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)> wrote:

On Tue, Jun 27, 2023 at 2:55 PM Sheldon Katz <[Sheldon@giantpartners.com](mailto:Sheldon@giantpartners.com)> wrote:

Hi Scott and Corey,

So I think Scott should send something that is similar to the one below. It's to see if he will give you a call, and if he happens to chargeback, this email will be proof that he canceled and went dark on us.

Thoughts guys?

Hello Eugene,

I hope you are doing well. I wanted to address your recent email regarding the cancellation of your contract after the first month.

As per the terms and conditions outlined in the contract, which we mutually agreed upon, the duration of the agreement is for 12 months, with an option to opt-out after four months. We understand that circumstances can change, and we value open communication with our clients. However, it is essential to note that we have tried to reach out to you by phone since we got your email, but unfortunately, we haven't been able to connect. We believe that discussing your concerns directly will allow us to explore possible solutions and ensure your satisfaction.

We genuinely value our partnership and are committed to finding a resolution that meets your needs. Please spare some time for a brief conversation to discuss the situation further.

Please let me know your availability for a call, and I will make sure a suitable time is scheduled to address your concerns as soon as possible.

Thank you for your attention to this matter, and I look forward to speaking with you soon.

Best regards,

Scott Owen  
Creative Director  
Giant Partners, Inc.

----- Forwarded message -----

From: **Corey Weissman** <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Date: Mon, Jun 26, 2023 at 1:24 PM

Subject: Re: IME Legal Reps - Website Review

To: IMF Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> Scott Owen

IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)>, Scott Owen <[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)>, Dan Millet <[danmillet@giantpartners.com](mailto:danmillet@giantpartners.com)>, Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>, Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)>

Hi Eugene,

Thank you for your email, is there a good day or time we can talk for a few minutes this week?

We would like to discuss your website, our partnership together and what's been going on with your company.

Let me know what day/time works best for you.

All my best,

Corey

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

On Mon, Jun 26, 2023 at 5:06 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

Good morning, we have decided not to move forward with marketing at this time. Thank you for your time.

Eugene

On Wed, Jun 7, 2023, 12:04 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hey Eugene!

I hope all is well, I have been trying to reach you regarding your partnership with us, could you give me a call when you have a chance?

My direct line is: 805-871-0425.

We look forward to hearing from you soon!

Thanks,

Corey

**COREY WEISSMAN**

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

On Tue, Jun 6, 2023 at 4:33 PM Estefania Sedano

<[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Eugene,

Website updated!

**ESTEFANIA SEDANO**

Call: (805) 267-1575 ext.130

Text: (805) 262 7994

Email: [estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Tue, Jun 6, 2023 at 4:38 PM Estefania Sedano

<[estefania@giantpartners.com](mailto:estefania@giantpartners.com)> wrote:

Hey Eugene,

Thank you for the call!

Here's the PageProof link I mentioned:

<https://app.pageproof.com/proof/web/P7PBFHYCDA1G88O1?referrer=share>

Please add there the things that we need to fix ASAP.

Cheers,


**ESTEFANIA SEDANO**

Giant Partners, Account Manager

Call: (805) 267-1575 ext.130

Text: (805) 262 7994

Email: [estefania@giantpartners.com](mailto:estefania@giantpartners.com)

**From:** Scott Owen [scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)   
**Subject:** Re: IME Legal Reps - Website Review  
**Date:** June 27, 2023 at 17:54  
**To:** Sheldon Katz [sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)  
**Cc:** Corey Weissman [corey@giantpartners.com](mailto:corey@giantpartners.com)

SO

Sure thing.

**SCOTT OWEN**

[Giant Partners](#)

Creative Director

(805) 267-1575 ext 124

[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)



On Jun 27, 2023, at 4:54 PM, Sheldon Katz <[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)> wrote:

Yes, please. Can you also cc Corey?

Thank you very much!

**SHELDON KATZ**

COO

[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)

Office: (805) 267-1575

LinkedIn: [Let's Connect](#)

---

**From:** Scott Owen <[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)>

**Sent:** Tuesday, June 27, 2023 2:40 PM

**To:** Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>; Sheldon Katz <[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)>

**Subject:** Re: IME Legal Reps - Website Review

I like it. Shall I send?

Sent from my iPhone

---

On Jun 27, 2023, at 4:35 PM, Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

I agree and like the email. Good to go for me.

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

---

On Tue, Jun 27, 2023 at 2:22 PM Sheldon Katz <[sheldon@giantpartners.com](mailto:sheldon@giantpartners.com)> wrote:

On Tue, Jun 27, 2023 at 2:55 PM Sheldon Katz <[Sheldon@giantpartners.com](mailto:Sheldon@giantpartners.com)> wrote:

Hi Scott and Corey,

So I think Scott should send something that is similar to the one below. It's to see if he will give you a call, and if he happens to chargeback, this email will be proof that he canceled and went dark on us.

Thoughts guys?

Hello Eugene,

I hope you are doing well. I wanted to address your recent email regarding the cancellation of your contract after the first month.

As per the terms and conditions outlined in the contract, which we mutually agreed upon, the duration of the agreement is for 12 months, with an option to opt-out after four months. We understand that circumstances can change, and we value open communication with our clients. However, it is essential to note that we have tried to reach out to you by phone since we got your email, but unfortunately, we haven't been able to connect. We believe that discussing your concerns directly will allow us to explore possible solutions and ensure your satisfaction.

We genuinely value our partnership and are committed to finding a resolution that meets your needs. Please spare some time for a brief conversation to discuss the situation further.

Please let me know your availability for a call, and I will make sure a suitable time is scheduled to address your concerns as soon as possible.

Thank you for your attention to this matter, and I look forward to speaking with you soon.

Best regards,

Scott Owen  
Creative Director  
Giant Partners, Inc.

----- Forwarded message -----

From: **Corey Weissman** <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Date: Mon, Jun 26, 2023 at 1:24 PM

Subject: Re: IME Legal Reps - Website Review

To: IMF Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> Scott Owen

IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)>, Scott Owen <[scottowen@giantpartners.com](mailto:scottowen@giantpartners.com)>, Dan Millet <[danmillet@giantpartners.com](mailto:danmillet@giantpartners.com)>, Conor McDaniel <[conor@giantpartners.com](mailto:conor@giantpartners.com)>, Safa Gelardi <[safagelardi@gmail.com](mailto:safagelardi@gmail.com)>

Hi Eugene,

Thank you for your email, is there a good day or time we can talk for a few minutes this week?

We would like to discuss your website, our partnership together and what's been going on with your company.

Let me know what day/time works best for you.

All my best,

Corey

**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

On Mon, Jun 26, 2023 at 5:06 AM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:

Good morning, we have decided not to move forward with marketing at this time. Thank you for your time.

Eugene

On Wed, Jun 7, 2023, 12:04 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

Hey Eugene!

I hope all is well, I have been trying to reach you regarding your partnership with us, could you give me a call when you have a chance?

My direct line is: 805-871-0425.

We look forward to hearing from you soon!

Thanks,

Corey

**COREY WEISSMAN**



**COREY WEISSMAN**

[corey@giantpartners.com](mailto:corey@giantpartners.com)

(805) 267-1575 ext 126

[Schedule meeting](#)

On Tue, Jun 6, 2023 at 4:33 PM Estefania Sedano

[<estefania@giantpartners.com>](mailto:estefania@giantpartners.com) wrote:

Hey Eugene,

Website updated!

**ESTEFANIA SEDANO**

Call: (805) 267-1575 ext.130

Text: (805) 262 7994

Email: [estefania@giantpartners.com](mailto:estefania@giantpartners.com)

On Tue, Jun 6, 2023 at 4:38 PM Estefania Sedano

[<estefania@giantpartners.com>](mailto:estefania@giantpartners.com) wrote:

Hey Eugene,

Thank you for the call!

Here's the PageProof link I mentioned:

<https://app.pageproof.com/proof/web/P7PBFHYCDA1G88O1?referrer=share>

Please add there the things that we need to fix ASAP.

Cheers,

**ESTEFANIA SEDANO**

Giant Partners, Account Manager

Call: (805) 267-1575 ext.130

Text: (805) 262 7994

Email: [estefania@giantpartners.com](mailto:estefania@giantpartners.com)

**From:** Conor McDaniel conor@giantpartners.com  
**Subject:** Re: imelegalreps  
**Date:** April 12, 2023 at 13:07  
**To:** Corey Weissman corey@giantpartners.com  
**Cc:** Jeremy Koenig jeremy@giantpartners.com

Received - thank you Corey.

Cheers,

**CONOR MCDANIEL**  
Director of Operations  
[conor@giantpartners.com](mailto:conor@giantpartners.com)  
(805) 267-1575 x151  
[Connect on LinkedIn](#)



On Tue, Apr 11, 2023 at 10:17 AM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:  
Hi Conor,

Here are the credentials for the GoDaddy account for Safa at IME Legal Reps.

I just asked about the hosting and will let you know.

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

----- Forwarded message -----

**From:** IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)>  
**Date:** Tue, Apr 11, 2023 at 10:14 AM  
**Subject:** Re: imelegalreps  
**To:** Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)>

Godaddy acct  
[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com) / 567675340 customer number  
paswd - Levicunt62

On Tue, Apr 11, 2023 at 10:59 AM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:  
Good morning Safa!

I hope all is well with you, are you planning on securing the agreement today so we can get going on the website?

Please let me know if you have any questions.

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

On Mon, Apr 10, 2023 at 2:16 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:  
Hi Safa,

Here is the link to the new agreement, same details just new company, and us helping you build the new website.

Please let me know if you have any questions:

**Eugene Liddy** (IMELegalReps@Gmail.com)  
Eugene Liddy,

Click the link below to confirm your email address for your new PaymentGiant.com account.

<https://paymentgiant.com/index/confirm/key/5d305c3319670e4c6983114763847a49>

We are greatly looking forward to working with you again!

All my best,

Corey

**COREY WEISSMAN**

[Giant Partners](#)

Database Marketing Specialist  
[corey@giantpartners.com](mailto:corey@giantpartners.com)

Office: (805) 267-1575 ext 126

Direct: (805) 871-0425



[Connect on LinkedIn](#)

On Mon, Apr 10, 2023 at 12:59 PM IME Legal Reps <[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)> wrote:  
[info@imelegalreps.com](mailto:info@imelegalreps.com)  
1800-409-9921  
205 Charleston Lane  
Fate Texas 75189

**From:** IME Legal Reps imelegalreps@gmail.com  
**Subject:** Re: Invitation: GiantPartners & IME Legal Rep- Website Discussion @ Thu Mar 21, 2024 10am - 11am (PDT) (imelegalreps@gmail.com)  
**Date:** March 20, 2024 at 12:47  
**To:** Corey Weissman corey@giantpartners.com  
**Cc:** Jeremy Koenig jeremy@giantpartners.com

IR

Accepted.

On Wed, Mar 20, 2024 at 12:46 PM Corey Weissman <[corey@giantpartners.com](mailto:corey@giantpartners.com)> wrote:

### Join with Google Meet

#### Meeting link

[meet.google.com/vyh-eywu-azj](https://meet.google.com/vyh-eywu-azj)

#### Join by phone

(US) [+1 402-629-0119](tel:+14026290119)

PIN: 715239462

[More phone numbers](#)

#### When

Thursday Mar 21, 2024 · 10am – 11am (Pacific Time - Los Angeles)

#### Guests

Corey Weissman - organizer

Jeremy Koenig

[imelegalreps@gmail.com](mailto:imelegalreps@gmail.com)

[View all guest info](#)

**Reply** for imelegalreps@gmail.com

Yes

No

Maybe

More options

Invitation from [Google Calendar](#)

You are receiving this email because you are subscribed to calendar notifications. To stop receiving these emails, go to [Calendar settings](#), select this calendar, and change "Other notifications".

Forwarding this invitation could allow any recipient to send a response to the organizer, be added to the guest list, invite others regardless of their own invitation status, or modify your RSVP. [Learn more](#)

**From:** Safa Gelardi (via Google Drive) drive-shares-dm-noreply@google.com  
**Subject:** Share request for "Marketing Collaterals "  
**Date:** June 21, 2023 at 17:38  
**To:** conor@giantpartners.com  
**Cc:** scottowen@giantpartners.com, stevep@giantpartners.com, estefania@giantpartners.com

SG

## Share a folder?



Safa Gelardi (safagelardi@gmail.com) is **requesting access** to the following folder:

 Marketing Collaterals



Safa Gelardi is outside your organization.

[Manage sharing](#)

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA

You have received this email because safagelardi@gmail.com requested access to a file or folder located in Google Drive.

Google Workspace

**REMAINDER  
OF EXHIBIT  
FILED  
UNDER SEAL**

# EXHIBIT C



**FILED  
UNDER  
SEAL**

# EXHIBIT D

**Neuromuscular  
Rehabilitation  
Services, P.C.**

Edward. M. Weiland, M.D.  
Diplomate of The American Board of Psychiatry & Neurology

*Billing:* 45 Litchfield Road  
Port Washington, NY 11050

Office: Hampton Atrium \* 186 W. Montauk Hwy, Bldg. D6,  
Hampton Bays, NY 11946  
Tel: (631) 723-3133 \* Fax: (516) 482-3577

March 10, 2023

Siegel & O'Leary, LLP  
135 Pinelawn Road  
Suite 245N  
Melville, New York 11747  
Attn: Jennifer Klapman,

Re: Rohan Manragh  
Claim #: 32 7932 V89  
Exam Works #: 21941752  
D/A: 02/22/19

Dear Ms. Klapman:

As per your request, Mr. Rohan Manragh underwent an Independent Neurologic examination at Hampton Atrium, 186 W. Montauk Highway, Bldg D6, Hampton Bays, New York 11946 on March 10, 2023, for evaluation of injuries reportedly sustained during a motor vehicle accident. Please note that Mr. Manragh was evaluated in the presence of an IME companion, Mr. Jeff Beibin.

The claimant's photo ID was checked and verified.

Please note all recommendations regarding CDC Guidelines involving patient/claimant and doctor interaction regarding Covid-19 have been performed at the time of this examination.

**HISTORY OF INJURY:**

Mr. Rohan Manragh is currently a 37-year-old right-handed male who states that he was in his usual state of health until 02/22/19 when he reports being injured in a motor vehicle accident. Mr. Manragh states that while a restrained driver he sustained multiple injuries due to a rear end collision with a commercial vehicle. Mr. Manragh reports striking his head inside the vehicle but did not lose consciousness. He then complained of pain throughout the posterior aspect of the spine as well as in the areas of his left shoulder, right elbow and right wrist. For these injuries, Mr. Manragh was initially evaluated at the South Side Hospital Emergency Department where he was treated and released after multiple imaging studies were performed. He was discharged home with a neck brace. He was then advised to seek follow-up medical care and attention for his reported trauma.

Re: Rohan Manragh  
INDEPENDENT MEDICAL EXAMINATION  
March 10, 2023

**TREATMENT:**

Mr. Manragh does not recall being evaluated by a neurologist due to the incident date of 02/22/19. Mr. Manragh has been evaluated by an orthopedic surgeon, Dr. Finuoli as well as a spine surgeon, Dr. McCagno. He was evaluated by other healthcare specialists whose names he cannot recall at the present time. Mr. Manragh does indicate that he did undergo outpatient diagnostic studies to include x-rays, MRI studies as well as multiple nerve tests. Mr. Manragh indicates he is currently receiving physical therapy treatments at a frequency of two to three times a week. This therapy has been fairly continuous since the incident date under review. Mr. Manragh also indicates that he underwent a course of chiropractic spine manipulation treatments in excess of two years after this incident.

Mr. Manragh also indicates he underwent multiple injection procedures to include selective nerve blocks, multiple trigger point injections as well as epidural steroid injections under the direction of a pain management specialist. Due to persistent pain in the area of his right wrist, right elbow, left shoulder and lumbar spine, Mr. Manragh did undergo surgical procedures to these sites. The right wrist, right elbow and left shoulder surgical procedures were performed under the direction of Dr. Finuoli. A lumbar spine decompression procedure was performed under the direction of Dr. McCagno.

**REVIEW OF MEDICAL RECORDS:** The following is the list of medical records, which have been made available for review.

1. A Second Supplemental Verified Bill of Particulars, dated 09/29/22, Index #: 601787/2020.
2. Verified Bill of Particulars, Index #: 601787/2020.
3. Supplemental Verified Bill of Particulars, dated 03/18/21, Index #: 601787/2020.
4. Police accident report, dated 02/22/19.
5. Evaluation, Sanjeev Agarwal, M.D., dated 05/17/19.
6. Procedure note, Sanjeev Agarwal, M.D., dated 07/13/19.
7. Follow up evaluation, Sanjeev Agarwal, M.D., dated 08/10/19.
8. Procedure note, Sanjeev Agarwal, M.D., dated 08/24/19.
9. Follow up evaluation, Sanjeev Agarwal, M.D., dated 10/12/19.
10. ECG, Neuro Diagnostics, Anand Bhupinder, M.D., dated 10/25/19.
11. Follow up report, New York Spine Institute, Jung Choi, PA, dated 03/12/21.
12. Evaluation, Branch Orthopedics, Anthony Finuoli, D.O., dated 07/11/19.
13. Evaluation, Branch Orthopedics, Anthony Finuoli, D.O., dated 08/08/19.
14. Operative report, Anthony Finuoli, D.O., dated 09/04/19.
15. Office visits, Anthony Finuoli, D.O., dated 09/09/19 – 11/23/19.
16. Operative report, Anthony Finuoli, D.O., dated 11/27/19.
17. Office visits, Anthony Finuoli, D.O., dated 12/19/19 – 12/26/19.
18. X-ray wrist, Anthony Finuoli, D.O., dated 12/26/19.
19. X-ray elbow, Anthony Finuoli, D.O., dated 12/26/19.
20. Office visits, Anthony Finuoli, D.O., dated 01/20/20 – 12/14/20.
21. Hospital records/emergency department records, Good Samaritan Hospital Medical Center, dated 02/24/19.

Re: Rohan Manragh  
INDEPENDENT MEDICAL EXAMINATION  
March 10, 2023

22. Office visits, Barry Katzman, M.D., dated 04/12/19 – 06/28/19.
23. Office visits, Angel Macagno, M.D., dated 05/23/19 – 02/04/21.
24. Operative report, Angel Macagno, M.D., dated 02/10/21.
25. Office visits, Angel Macagno, M.D., dated 02/25/21 – 06/17/21.
26. Office visits, John McGhee, M.D., dated 05/13/20 – 07/01/21.
27. Emergency department record, Northwell Health, dated 09/22/19.
28. Office visit, Jeffrey Perry, D.O., dated 03/27/19.
29. EMG/NCV evaluation, Jeffrey Perry, D.O., dated 03/30/19.
30. Office visits, Jeffrey Perry, D.O., dated 05/01/19 – 11/06/19.
31. EMG/NCV report, dated 11/06/19, Jeffrey Perry, D.O.
32. Office visits, Jeffrey Perry, D.O., dated 12/07/19 – 04/29/20.
33. Office visits, South Shore Neurologic Associates, dated 05/19/25 – 09/30/22.
34. Evaluation, Myassar Zarif, M.D., dated 06/04/18.
35. MRI 3T brain pre & post IV contrast, Darren Buono, M.D., dated 12/18/19.
36. MRI 3T left shoulder w/o contrast, Joseph Hanono, M.D., dated 04/13/19.
37. MRI 3T right shoulder w/o contrast, Joseph Hanono, M.D., dated 04/13/19.
38. MRI of the lumbar spine w/o contrast, John Duncan, M.D., dated 02/12/20.
39. MRI 3T cervical spine w/o contrast, Brett Helfner, M.D., dated 02/28/19.
40. MRI 3T lumbar spine w/o contrast, Brett Helfner, M.D., dated 02/28/19.
41. MRI left hand w/o contrast, Brett Helfner, M.D., dated 03/31/19.
42. MRI 3T right wrist w/o contrast, Brett Helfner, M.D., dated 07/20/19.
43. MRI cervical spine noncontrast, Brett Helfner, M.D., dated 04/27/20.
44. MRI 3T left wrist w/o contrast, Brett Helfner, M.D., dated 03/31/21.
45. MRI 3T left hand w/o contrast, Brett Helfner, M.D., dated 03/31/21.
46. MRI 3T cervical spine noncontrast, Brett Helfner, M.D., dated 06/15/21.
47. MRI lumbar spine pre & post IV contrast, Brett Helfner, M.D., dated 02/15/22.
48. CT lumbar spine w/o contrast, Brett Helfner, M.D., dated 02/18/22.
49. MRI 3T brain w/o contrast, Michelle Rotblat, M.D., dated 06/24/20.
50. MRI brain, Michelle Rotblat, M.D., dated 01/20/22.
51. MRI brain w/o contrast, Katya Shpilberg, M.D., dated 02/04/21.
52. MRI 3T brain w/o contrast, Katya Shpilberg, M.D., dated 07/29/20.
53. MRI 3T brain w/o contrast, Katya Shpilberg, M.D., dated 08/16/21.
54. MRI brain w/o contrast, Katya Shpilberg, M.D., dated 08/05/22.
55. MRI of the thoracic spine, Steven Winter, M.D., dated 05/08/19.

#### **PAST MEDICAL HISTORY:**

Mr. Manragh's past medical history is significant for multiple sclerosis, which was diagnosed in 2011. He is under the care of Dr. Gudesblatt for this condition. Mr. Manragh is utilizing Tysabri for medical treatment of his pre-existing multiple sclerosis. Mr. Manragh indicates that his initial symptoms of multiple sclerosis were of numbness and paresthesias involving his spine and extremities.

Records indicate a past medical history significant for ADHD and a mood disorder.

Re: Rohan Manragh  
INDEPENDENT MEDICAL EXAMINATION  
March 10, 2023

### **SURGICAL HISTORY:**

As stated above, Mr. Manragh also indicates he underwent multiple injection procedures to include selective nerve blocks, multiple trigger point injections as well as epidural steroid injections under the direction of a pain management specialist.

As stated above, due to persistent pain in the area of his right wrist, right elbow, left shoulder and lumbar spine, Mr. Manragh did undergo surgical procedures to these sites. The right wrist, right elbow and left shoulder surgical procedures were performed under the direction of Dr. Finuoli. A lumbar spine decompression procedure was performed under the direction of Dr. McCagno.

Records indicate a past surgical history submitted for umbilical hernia repair in 2014, right eye surgery, secondary to gunshot removal.

### **MEDICATIONS:**

As stated above, Mr. Manragh is utilizing Tysabri for medical treatment of his pre-existing multiple sclerosis.

Mr. Manragh is currently utilizing Flexeril as needed for pain relief. He receives this medication under the direction of Dr. McCagno, who reevaluates Mr. Manragh at a frequency of every three months.

### **PAST MUSCULOSKELETAL TRAUMA:**

Mr. Manragh indicates that he did have prior lumbar spine trauma for which he did receive some type of treatment, which he was advised not to further elucidate during this examination. He indicates that the lumbar spine trauma occurred in the calendar year of 2006. He states that he recovered after sustaining this lumbar spine injury and was not left with any limitations to the area of his lumbar spine.

Mr. Manragh reports no prior history of significant musculoskeletal trauma to the other reported injuries due to the incident date of 02/22/19.

### **WORK HISTORY:**

Mr. Manragh indicates that he was out on Social Security Disability due to his comorbid medical condition of multiple sclerosis and was unemployed at the time of the incident date under review. Mr. Manragh is not working at the present time.

Re: Rohan Manragh  
INDEPENDENT MEDICAL EXAMINATION  
March 10, 2023

### **CURRENT COMPLAINTS:**

At present, Manragh complains of pain more prevalently in the area of his lumbar spine radiating into the area of his hips. He also complains of pain with weight bearing maneuvers involving the left shoulder as well as the right hand and wrist. These symptoms appear to be provoked with activities of daily living.

Please note that at the time of this examination Mr. Manragh was observed to be wearing a lumbosacral orthosis and utilizing a single-posted cane for weight bearing support in his right hand.

### **NEUROLOGICAL EXAMINATION:**

A detailed neurologic examination was performed. Cognitive functions were intact, without evidence of aphasia or apraxia. The extraocular movements were full, without evidence of nystagmus or ophthalmoparesis. The pupils were equal and briskly reactive to light and accommodation. Air conduction was greater than bone conduction bilaterally. The weber test was midline.

Examination of the cervical spine revealed flexion is to 40 degrees (normal 50 degrees), extension is to 50 degrees (normal 60 degrees), right and left lateral rotation is to 70 degrees (normal 80 degrees), and right and left lateral flexion is to 35 degrees (normal 45 degrees). There was no spasm or crepitus about the musculature. Lhermitte's Sign was absent. Cervical Compression test was negative.

Examination of the lumbar spine revealed flexion is to 40 degrees (normal 60 degrees), extension is to 5 degrees (normal 25 degrees), and right and left lateral flexion is to 5 degrees (normal 25 degrees). There was no spasm or crepitus about the musculature. Straight Leg Raising was unlimited at 90 degrees bilaterally, which is a normal finding. There was no sciatic notch tenderness. Patrick's maneuver is negative.

Well-healed surgical scar were noted in the area of the lumbar spine, left shoulder, right elbow as well as right wrist. No signs of active tissue inflammation or soft tissue swelling were noted at these sites of previous surgery.

There were subjective complaints of pain with minimal movement of the neck and lower back as well as the left shoulder, right elbow and right wrist. No joint crepitus or effusions were noted at these locations. Tinel's sign was absent over the right elbow and right wrist. The median nerve compression test was negative bilaterally. Phalen's maneuver was negative at 20 seconds bilaterally. Tinel's sign was absent over the right lateral epicondylar surface. There was no clinical evidence of scapular winging. Adson's maneuver was negative on the left.

Re: Rohan Manragh  
INDEPENDENT MEDICAL EXAMINATION  
March 10, 2023

All measurements were performed using a goniometer.

These findings have been determined by The American Medical Association Guides to the Evaluation of Permanent Impairment, Fifth Edition, pages 596 through 598.

The segmental motor examination revealed 4/5 power diffusely in the proximal and distal muscle groups involving the upper and lower extremities. Evidence of give-away motor resistance was noted in the proximal muscle groups involving both upper limbs in the area of the rotator cuff musculature as well as upon hip flexion and extension. This physical examination finding appeared to be related to volitional control offered by Mr. Manragh at the time of this examination.

No reproducible dermatomal or posterior column distribution sensory loss was noted. Reflexes were 2+ and symmetric throughout, with plantar flexor responses bilaterally. Coordination skills were slow by nonlateralizing. Mr. Manragh's gait would be described to be minimally antalgic, as he had difficulty walking with minimal one-person assistance. There was no evidence of a foot drop or hip tilt. The Romberg test was positive.

#### **IMPRESSION/DIAGNOSIS:**

1. History of closed head trauma – resolved.
2. Cervical, thoracic and lumbar myofascial pain disorder.
3. Status post surgical procedure to include the lumbar spine.

#### **CONCLUSIONS:**

Mr. Rohan Manragh relates experiencing multiple trauma while involved in a motor vehicle accident occurring on 02/22/19. Mr. Manragh does have a prior history of multiple sclerosis, which was diagnosed approximately eight years before the incident date under review. The neurologic examination findings identified today indicate that there is some restricted mobility in the region of the neck and the lower back as well as diffuse motor weakness noted in both the upper and lower limbs associated with functional impairment with regards to gait functioning. Some of these objective findings may in fact be related to the preexisting neurologic condition of multiple sclerosis which predates the incident date under review by approximately eight years.

At the present time, I do not feel that any further neurological investigational studies or neurologic treatment modalities are indicated due to the incident date under review. Mr. Manragh should continue to be reevaluated by his private neurologist, Dr. Gudesblatt, for the preexisting condition of multiple sclerosis. At the present time, I see no reason why Mr. Manragh should not be able to perform activities of daily living with only minimal assistance. Based upon the neurologic examination findings noted today, it is my opinion that Mr. Manragh may be able to perform employment responsibilities in a sedentary position.

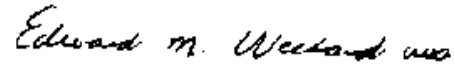


Re: Rohan Manragh  
INDEPENDENT MEDICAL EXAMINATION  
March 10, 2023

If you have any further questions with regards to this matter, kindly feel free to contact this office.

I hereby declare and affirm, pursuant to CPLR 2106, under the penalties of perjury, that I am a physician licensed to practice in the State of New York and that the statements contained in this report are true and made under penalties of perjury.

Sincerely,

A handwritten signature in cursive script that reads "Edward M. Weiland".

EDWARD M. WEILAND, M.D.  
Board Certified Neurologist  
New York State License Number: 158445-1  
TIN 11-3571112

EMW/lf

# EXHIBIT E

**JEFFREY M. SPIVAK, M.D.**

Orthopedic Spine Surgeon  
Director of Spine Service – Technology and Innovation  
Clinical Professor of Orthopedic Surgery  
NYU Langone Medical Center  
301 East 17<sup>th</sup> Street, Suite 400  
New York, New York 10003  
Phone: 914.536.8446

March 14, 2023

Matthew Blihar, Paralegal  
Fabiani Cohen & Hall, LLP  
570 Lexington Avenue, 4<sup>th</sup> Floor  
New York, NY 10022

**Re: Miguel Ovalles Diaz**

[REDACTED]

Date of Loss: 1/26/2018

Dear Mr. Blihar,

Today, I have seen and examined Miguel Ovalles Diaz for a follow-up expert spinal independent medical examination. I originally saw and examined Mr. Diaz on 5/18/21, as detailed in my narrative report of that date. Mr. Diaz is seen here today in my Manhattan office, accompanied by Sara Gonzalez from Client Exam Services. Also with us is Carlos Izbarte from Craney Interpreting Services, acting as Spanish interpreter. Mr. Diaz' identity is confirmed by review of his active New York State driver's license.

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

# EXHIBIT F

MATTHEW M. SHATZER, DO, PHYSICAL MEDICINE & REHABILITATION

June 1, 2023

Claimant: Miguel Ovalles Diaz

[REDACTED]

Date of Accident: 1/26/18

Date of Evaluation: 4/12/23

To Whom It May Concern,

I had the opportunity to perform a Physical Medicine and Rehabilitation re-evaluation of Mr. Miguel Ovalles Diaz on April 12, 2023. Mr. Diaz was accompanied by Lizbeth Medina, who identified herself as his legal representative. Also present was Aldo Cabanillas, Spanish interpreter from Craney Interpreting.

[REDACTED]

[REDACTED]

- 1) [REDACTED]
- 2) [REDACTED]
- 3) [REDACTED]
- 4) [REDACTED]
- 5) [REDACTED]
- 6) [REDACTED]
- 7) [REDACTED]
- 8) [REDACTED]
- 9) [REDACTED]
- 10) [REDACTED]
- 11) [REDACTED]

# EXHIBIT G

**Douglas B. Unis, M.D.**  
425 W. 59<sup>th</sup> St, 5<sup>th</sup> Fl.  
New York, NY 10019

---

05/08/2023

Rebore Thorpe & Pisarello, P.C.  
500 Bi County Blvd. #102  
Farmingdale, NY 11735

Re: Nunez-Jimenez, Allendy  
Claim#: EWR00214557  
DOI: 07/15/2021

To Whom It May Concern:

As per your request, the claimant was seen at my Brooklyn, NY office for an independent orthopaedic examination on 04/07/2023. Covid-19 protocol was observed throughout this evaluation. The claimant was accompanied by Christian Hogarth from Client Exam Services.

**HISTORY AS ALLEGED BY CLAIMANT:**

On 07/15/2021, the claimant was reportedly involved in a trip and fall accident.. He reports that he tripped on a sidewalk. He reports no loss of consciousness. He was taken to a hospital immediately following accident where he was treated and released the same day. Initial complaints included bilateral shoulder, neck and low back pain. Treatment has included left shoulder arthroscopy, physical therapy, and injections.

**CURRENT COMPLAINTS:**

The claimant continues to complain of neck and low back pain. There were no other complaints at the time of the examination.

**PAST MEDICAL HISTORY**

The claimant reports no significant medical history.

**PAST SURGICAL HISTORY**

As above

**ALLERGIES:**

No Known Drug Allergies

**CURRENT MEDICATIONS:**

None

**FAMILY HISTORY**

None reported



**SOCIAL**

ETOH (social)

Tob Negative

**WORK HISTORY:**

At the time of the accident the claimant was not employed.

The claimant is currently not working.

**REVIEW OF AVAILABLE MEDICAL RECORDS:**

1. Verified Bill of Particulars, Index No.: 507576/2022.
2. Emergency department reports, dated 07/15/2021, New York-Presbyterian Hospital.
3. X-ray report of the thoracic spine and lumbar spine, dated 07/15/2021, Annie Chandrankunnel, M.D.
4. X-ray report of the bilateral femurs, dated 07/15/2021, Annie Chandrankunnel, M.D.
5. X-ray report of the bilateral shoulders, dated 07/15/2021, Annie Chandrankunnel, M.D.
6. X-ray report of the chest, dated 07/15/2021, Annie Chandrankunnel, M.D.
7. MRI report of the left shoulder, dated 09/08/2021, Thomas Kolb, M.D.
8. MRI report of the right shoulder, dated 09/08/2021, Thomas Kolb, M.D.
9. Initial orthopedic consultation report, dated 10/14/2021, Kenneth McCulloch, M.D.
10. Orthopedic followup evaluation reports, dated 12/10/2021 and 07/08/2022, Kenneth McCulloch, M.D.
11. SARS-CoV-2 test report, dated 03/04/2022, RDx BioScience.
12. History and physical examination report, dated 03/07/2022, Fifth Avenue Surgery Center.
13. Anesthesia record, dated 03/07/2022, illegible signature.
14. Peri-operative single brachial plexus block of the left neck, dated 03/07/2022, Kenneth McCulloch, M.D.
15. Left shoulder arthroscopic superior labrum anterior to posterior (SLAP) repair, left shoulder arthroscopic rotator cuff tear and bursal debridement, left shoulder arthroscopic synovectomy, and left shoulder arthroscopic subacromial decompression, dated 03/07/2022, Kenneth McCulloch, M.D.
16. Post-operative report, dated 03/07/2022, Fifth Avenue Surgery Center.
17. Post-operative visit note, dated 03/07/2022, Kenneth McCulloch, M.D.
18. Referral for durable medical equipment, dated 03/07/2022, Kenneth McCulloch, M.D.
19. Letter of medical necessity/physician's order, dated 03/07/2022, Kenneth McCulloch, M.D.
20. Prescription/letter of medical necessity, dated 03/07/2022, Kenneth McCulloch, M.D.
21. Physician's order, dated 03/07/2022, Fifth Avenue Surgery Center.
22. Referral for physical therapy evaluation and treatment, dated 03/22/2022, Kenneth McCulloch, M.D.
23. Colored surgical photographs.

**CLINICAL SUMMARY:**

On 07/15/2021, the claimant visited New York-Presbyterian Hospital Emergency Department with the complaints of headache, right-sided neck pain, bilateral shoulders pain, back pain, and bilateral legs pain. The physical examination of the chest revealed tenderness. The physical examination revealed bilateral shoulder tenderness, bilateral distal femur tenderness, thoracic and lumbosacral spine tenderness at T8-T9 and L2-L3, and right paraspinal tenderness. Diagnostic



tests were reviewed. The claimant was advised over-the-counter medications. The claimant was discharged to home on the same day.

On 07/15/2021, an x-ray of the thoracic spine and lumbar spine was performed by Annie Chandrankunnel, M.D. (Diagnostic Radiology). The impression included: No acute fracture or dislocation of the thoracolumbar spine.

On 07/15/2021, an x-ray of the bilateral femurs was performed by Dr. Chandrankunnel. The impression included: No acute fracture or dislocation of the bilateral femurs.

On 07/15/2021, an x-ray of the bilateral shoulders was performed by Dr. Chandrankunnel. The impression included: No acute fracture or dislocation of the bilateral shoulders.

On 07/15/2021, an x-ray of the chest was performed by Dr. Chandrankunnel. The impression included: No focal lung consolidation.

On 09/08/2021, an MRI of the left shoulder was performed by Thomas Kolb, M.D. (Radiology). The impression included: Tear of the anterior superior labrum with a small associated joint effusion.

On 09/08/2021, an MRI of the right shoulder was performed by Dr. Kolb. The impressions included: Tear of the posterior superior labrum with associated 1/0 centimeter posterior suprascapular cyst. Clinical correlation for suprascapular neuropathy is in order.

On 10/14/2021, Kenneth McCulloch, M.D. (Orthopedic Surgery) saw the claimant for an initial orthopedic consultation with a chief complaint of bilateral shoulders pain. The right shoulder pain was rated as an 8/10. The left shoulder pain was rated as a 6/10. The physical examination of the bilateral shoulders revealed decreased range of motion, tenderness to palpation over the anterior humeral head, pain to palpation over the biceps tendon in the bicipital groove bilaterally, positive Neer test, positive Hawkins test, and positive O'Brien's test. An MRI of the bilateral shoulders was reviewed. The assessment was bilateral shoulder traumatic labral tears. The claimant was advised to continue physical therapy and home exercise program. The claimant was prescribed ibuprofen and Tylenol. The claimant was recommended to followup. On 12/10/2021 and 07/08/2022, the claimant followed up with Dr. McCulloch for an orthopedic followup evaluation. On 12/10/2021, the plan was to perform left shoulder arthroscopic subacromial decompression and superior labrum anterior and posterior tear (SLAP) repair. On 07/08/2022, the claimant was status post left shoulder arthroscopy.

On 03/04/2022, a SARS-CoV-2 test report was provided by RDx BioScience. The test was negative.

On 03/07/2022, the claimant visited Fifth Avenue Surgery Center for a history and physical examination. The claimant was medically cleared for surgery in ambulatory setting.

On 03/07/2022, an anesthesia record was provided by an unknown provider.

On 03/07/2022, a brachial plexus block under ultrasound guidance was performed by Dr. McCulloch. The diagnosis was shoulder pain.



On 03/07/2022, Dr. McCulloch performed: Left shoulder arthroscopic SLAP repair, left shoulder arthroscopic rotator cuff tear and bursal debridement, left shoulder arthroscopic synovectomy, and left shoulder arthroscopic subacromial decompression. The pre-operative diagnoses were left shoulder SLAP tear, labral tear, and rotator cuff tear. The post-operative diagnoses were left shoulder SLAP tear, labral tear, rotator cuff tear, synovitis, and impingement.

On 03/07/2022, a post-operative report was provided by Fifth Avenue Surgery Center.

On 03/07/2022, a post-operative report was provided by Dr. McCulloch.

On 03/07/2022, a referral for durable medical equipment was provided by Dr. McCulloch.

On 03/07/2022, a letter of medical necessity/physician's order was provided by Dr. McCulloch.

On 03/07/2022, a prescription/letter of medical necessity was provided by Dr. McCulloch.

On 03/07/2022, a physician's order was provided by Fifth Avenue Surgery Center.

On 03/22/2022, a referral for physical therapy evaluation and treatment was provided by Dr. McCulloch.

## **PHYSICAL EXAMINATION**

For the purpose of identification only, this is a Hispanic male weighing approximately 228 pounds, 5 feet 7 inches, with brown eyes and brown hair. He walks in and out of the examination room with a non-analgesic gait and does not use any ambulatory aids. He is able to get on and off an elevated examination table with both arms hyperextended and no signs of pain or difficulty noted.

Range of motion determination was performed by both my expert clinical eye and judgment as a board-certified orthopaedic surgeon of such exams as well as the use of orthopaedic goniometer. Any range of motion finding less than normal and/or asymmetrical with the contra-lateral side is confirmed with goniometer. Range of motion is a subjective finding under the voluntary control of the individual being tested. Variables such as body habitus, age, conditioning as well as the claimant's effort may affect the observed results. The "normal" values in accordance with the AMA Guides to Evaluation of Permanent Impairment, 6<sup>th</sup> Edition, are included. Differences between measured values and "normal" values are reserved for discussion at the conclusion of this report. The endpoint for each range is the claimant's complaint of pain. The claimant is not forced beyond this point. Therefore, the results are subjective in nature. Observations are routinely made for spasm.

### **Cervical Spine**

Extension 60° (60° normal)

Flexion 50° (50° normal)

Left Rotation 80°/Right rotation 80° (80° normal)

Right lateral side bend 45°/Left lateral side bend 45° (45° normal).

No pain during or at extremes of range of motion. He has no spasms or tenderness to palpation of the paracervical, trapezial, or interscapular muscles.

Motor and sensory examination of the upper extremities reveals grade 5/5 muscle strength of all major upper extremity muscle groups and normal upper extremity sensory exam.

Reflexes 2+: triceps, biceps, brachioradialis, patellar and Achilles.

Serial grip strength measurements in this right-hand dominant individual are 5/5

Negative Spurling's test.

Negative clonus.

Down-going Babinski sign.

### **Chest/Sternum**

No tenderness on palpation. There is negative sternal compression test. There is negative tenderness to palpation of the anterior and posterior ribs bilaterally.

### **Thoracolumbar Spine**

Maintenance of normal lordotic curvature.

Flexion 90° (normal minimum of 60°)

Extension 35° (normal minimum 25°)

Left rotation 35°/Right rotation 35° (normal minimum 25°)

Left lateral side bend 35°/Right lateral side bend 35° (normal minimum 25°)

No pain noted during or at extremes of range of motion.

No spasms or tenderness to palpation of the paraspinal musculature, spinous processes, sacroiliac joint or sciatic notch.

Motor exam: 5/5 muscle strength in all major lower extremity muscle groups

Sensation: intact to pin prick and light touch in all lower extremity dermatomes

Able to perform toe rise, heel rise, squat and stand with no objective signs of difficulty.

Straight leg-raise: No pain from 30° to 70°

### **Right Shoulder**

Forward flexion 180° (180° normal)

Internal rotation 90° (normal 90°)

External rotation 90° (normal 90°)

Abduction 110° (normal 110°)

No pain during or at extremes of range of motion.

5/5 abduction and external rotation strength.

Negative Hawkins sign, negative impingement sign and negative Speed's and Yergason's test.

Negative O'Brien's test. Negative warmth, swelling or crepitus on palpation.

### **Left Shoulder**

Well healed scope portals with some keloid formation

Forward flexion 180° (180° normal)

Internal rotation 90° (normal 90°)

External rotation 90° (normal 90°)

Abduction 110° (normal 110°)

No pain during or at extremes of range of motion.

5/5 abduction and external rotation strength.

Negative Hawkins sign, negative impingement sign and negative Speed's and Yergason's test.

Negative O'Brien's test. Negative warmth, swelling or crepitus on palpation.



**Bilateral Elbows**

Flexion 140° (Normal 140°)

Supination/Pronation 90° (Normal 90°)

No pain during or at extremes of range of motion.

Negative warmth, swelling and tenderness on palpation to either elbow medially or laterally, anteriorly or posteriorly.

Stable to varus and valgus stress.

No tenderness on the medial or lateral epicondyles of the elbows.

No pain on resisted extension or flexion of either elbow.

**Bilateral Hands/Wrists**

80 out of 80 degrees of dorsiflexion, 80 out of 80 degrees palmar flexion with 20 out of 20 degrees of abduction, and 30 out of 30 degrees adduction with no pain during or at extremes of range of motion of either wrist. There is negative warmth, swelling or tenderness on palpation to either wrist. . There is grade 5/5 muscle strength of all movements of the wrist and fingers, and normal sensory exam to the wrist and fingers with negative Tinel's sign, negative Phalen's sign, negative wasting of the thenar, hypothenar, and intrinsic musculature.

**Right Hip**

Extension 30° (normal 20-30°)

Flexion 140° (normal 120-135°)

Internal Rotation 50° (normal 30°)

External Rotation 70° (normal 50°)

Abduction 45° (normal 40-50°)

Without pain during or at extremes of range of motion.

There is no tenderness to palpation of the ASIS, Ischial Tuberosity or Greater Trochanter

Negative Ober's Test

Negative Stinchfield Test

Negative FADIR

Negative Trendelenburg Test

Negative Thomas Test

**Left Hip**

Extension 30° (normal 20-30°)

Flexion 140° (normal 120-135°)

Internal Rotation 50° (normal 30°)

External Rotation 70° (normal 50°)

Abduction 45° (normal 40-50°)

Without pain during or at extremes of range of motion.

There is no tenderness to palpation of the ASIS, Ischial Tuberosity or Greater Trochanter

Negative Ober's Test

Negative Stinchfield Test

Negative FADIR

Negative Trendelenburg Test

Negative Thomas Test

**Right Knee**

Extension 0° (normal 0°)

Flexion 140° (normal 140°)

7

Axial Alignment: Neutral

No pain during or at extremes of range of motion

Negative crepitus, warmth or effusion.

Negative tenderness to palpation.

Negative McMurray's test

Negative Lachman and Pivot Shift test

Stable to varus & valgus stressing at 0°/20°/90°

#### **Left Knee**

Extension 0° (normal 0°)

Flexion 140° (normal 140°)

Axial Alignment: Neutral

No pain during or at extremes of range of motion

Negative crepitus, warmth or effusion.

Negative tenderness to palpation.

Negative McMurray's test

Negative Lachman and Pivot Shift test

Stable to varus & valgus stressing at 0°/20°/90°

#### **Bilateral Feet/Ankles**

No tenderness, swelling or deformity in the region of the ankle, mid foot or forefoot regions. Full range of motion and normal neurovascular status of the ankle, foot and forefoot regions with the ankle having 25 out of 25 degrees of extension, 40 out of 40 degrees of flexion, 20 out of 20 degrees of abduction and 30 out of 30 degrees of adduction, with no pain during or at extremes of range of motion. Single heel rise performed without difficulty.

Upon completion of the examination the claimant offered no complaints as a result of the examination and left the examination room stable and unchanged.

#### **DIAGNOSIS:**

1. Cervical spine strain- resolved
2. Lumbar spine strain- resolved
3. Bilateral shoulder contusion s/p L shoulder scope- resolved
4. Bilateral knee strain-resolved

#### **DISCUSSION:**

According to the provided medical records, the claimant was reportedly involved in a trip and fall accident and sought treatment for neck, low back and bilateral shoulder pain. He underwent left shoulder arthroscopy however the mechanism of injury and MRI report are not consistent with acute trauma. The MRI report findings for the left shoulder revealed evidence of pre-existing degenerative changes. Color intraoperative photos show a degenerative SLAP lesion repairs with suture anchors. This condition is degenerative and the surgery performed addressed an issue unrelated to the subject accident. If the MRI images become available, then I would be happy to review them and provide further comment.

Based on the medical records provided, there was no MRIs performed for the cervical spine, lumbar spine or bilateral knees.

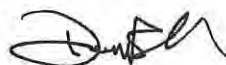
Today's examination of the cervical spine, lumbar spine, bilateral shoulders and bilateral knees revealed no decreased range of motion, neurological deficits or positive provocative tests. There was no objective evidence of radiculopathy, impingement or internal derangement. It should be noted that the claimant had no complaints of bilateral shoulder or bilateral knee pain at today's examination.

In my medical opinion, the claimant is not disabled. He is able to work and perform his usual and customary activities of daily living without orthopedic restrictions or limitations. There is no objective evidence of a causally related permanency.

I am a Professional Physician licensed to practice in the State of New York and a fellow of the American Academy of Orthopedic Surgeons. I submit that this report was prepared by me, is true and accurate and contains my opinions and findings based upon a reasonable degree of medical certainty.

I, Douglas B. Unis, M.D., being a physician duly licensed to practice in the State of New York, under the penalties of perjury pursuant to CPLR Section 2106, do hereby affirm the contents of the foregoing.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Unis', with a stylized flourish at the end.

Douglas B. Unis, MD

# EXHIBIT H





Mark A. Sandberg, Ph.D., ABPP, ABN  
Licensed Psychologist • Rehabilitation Neuropsychology

June 15, 2023

Martin Schwartzberg, Esq.

Attorney at Law

Marshall Dennehey

175 Pinelawn Rd.

Suite 250

Melville, NY 11747

RE: Fausto Deleg v. Key Court Condominium et. al.

DOB: 2-15-1990 (age 33)

Date of accident: 6-2-2020

Date of Examination: 4-13-2023

Dear Mr. Schwartzberg,

At your request, I had the opportunity to meet with 33-year-old Fausto Deleg for the purpose of performing an independent psychological examination. Mr. Deleg is plaintiff in the ongoing legal proceedings described above and was required to undergo examination at the request of defense counsel.

Mr. Deleg speaks limited English, so Isabel Vetrano, a court certified interpreter assisted in the examination process. Also present was Tiffany Uribe, a representative from the Ginarte Law Firm.



Fausto Deleg v. Key Court Condominium et. al.

### ***Informed consent***

I prefaced the examination with a discussion of the purpose of today's meeting. I told Mr. Deleg that I will review all information that had been sent to my office from the referring party, as relevant to the purpose of this examination. I explained that I would take a detailed history from him, perform an examination which would include standardized tests, and then I would send a report to the requesting party. I clarified that no doctor/patient relationship is present, and that my role is not to provide any kind of treatment intervention. Furthermore, I asked Mr. Deleg to give his best effort during the examination and to respond honestly to questions asked about his history and current condition. After discussing these stipulations and offering to answer any questions, we jointly agreed to proceed.

### ***Summary of Records***

What follows is an outline of the records reviewed and a summary of findings:

- Verified Bill of Particulars Index No.: 607636/2020 from the Supreme Court of the State of New York, County of Nassau. Numerous injuries are described including the mental disorder Post-traumatic Stress Disorder (PTSD) and post-concussion syndrome.
- First Supplemental Bill of Particulars Index No.: 607636/2020 along with an attachment of an operative note dated 6-18-2021 from Fifth Ave Surgery Center. The preoperative diagnosis is left knee medial meniscus tear. The post operative diagnoses are left knee medial and lateral meniscus tears, synovitis, chondromalacia patella.
- Second Supplemental Verified Bill of Particulars Index No.: 607636/2020 along with an attachment of an operative report from Trinitas Regional Medical Center dated 11-9-2021. The pre/post operative diagnosis is lumbar disc derangement/herniation.
- Examination Before Trial (EBT) of Fausto Deleg dated 9-10-2021.
- Pictures labeled Exhibit A and Exhibit B
- Case Report from the Nassau County Police Department. The occurrence date is 6-2-2020 @ 1050 (Tuesday). The narrative reads, "At TPO aided suffered a head and back laceration from sheet metal that fell at a construction site. Aided was transported to Winthrop by FD 261."
- Records from Trinitas Regional Medical Center stating an admission date of 11-9-2011 and discharge date of 11-11-2021. The admitting diagnosis is "Other herniation of intervertebral disc of lumbosacral spine." The history of present illness reads, "Mr. Deleg is a 31-year-old gentleman involved in a work accident that occurred on June 2, 2020, a metal plate fell on him, since then has been suffering with severe low back pain. The pain is in the lumbosacral junction." The physician is Paul Ratzker, MD. The record notes that he is being treated for anxiety. Results of the Columbia Suicide Severity- Rating Scale (C-SSRS) indicate that his risk level for suicide is "no risk." The procedure performed was a posterior lumbar interbody and lateral fusion, L5-S1. The hospital discharge instructions

Fausto Deleg v. Key Court Condominium et. al.

included “resume previous activities with no restrictions. Weight bearing as tolerated. Regular diet. The hospital course reads, “Underwent lumbar fusion no complications.”

- Summons from the Supreme Court of the State of New York, County of Nassau. It concerns the matter of Fausto Deleg (plaintiff) against Key Court Condominium and Key Court Realty, LLC (Defendant).
- Verified Complaint from the Supreme Court of the State of New York, County of Nassau.
- Records from Total Orthopedics & Sports Medicine. The physician is Ramech Pitti Babu, MD. The diagnosis is “low back pain; Other intervertebral disc degeneration, lumbosacral region.” The visit is described as a “treatment evaluation.” Comments read, “Advised laminectomy and microdiscectomy at L5-S1 on the right side.”
- Records from The Back Institute, Dr. Paul Ratzker. The record of 10-30-2020 states, “Apparently, some metal plates fell on his head. He actually sustained a loss of consciousness with significant right forehead laceration, taken urgently to Winthrop ER where he was evaluated and had his laceration sutured. A trial of injective treatment was recommended.
- MRI of the thoracic spine dated 6-14-2020 which revealed, Focal right sided paracentral T4-5 herniation causing moderate cord impingement. Broad based right sided T7-8 herniation indenting the sac.”
- MRI of lumbosacral spine dated 6-14-2020. The impression is “Broad-based herniation at L5-S1 displaces the right S1 nerve root.”
- Office note from Dr. Paul Ratzker dated 12-17-2021 which described Mr. Deleg’s condition “a month status post his L5-S1 fixation and fusion”.
- Records from Premier East Physical Medicine and Rehabilitation, PC. The physician is John Velez, MD. The listed dates of service are 6-10-2020 through 5-12-2021. The initial Physiatric evaluation is dated 6-10-2020. The narrative report states, “He suffered head and facial trauma with loss of consciousness which he regained while at the scene.” The report provided summary of a head CT taken 6-2-2020” “No acute traumatic injury”. Numerous assessment impressions were delineated including “posttraumatic headaches and dizziness and Posttraumatic nervousness and anxiety.” Among the professionals who were recommended were a neurologist and psychologist. Follow-up physiatry evaluations were conducted during the period 7-8-2020 through 4-14-2021 along with provision of physical therapy services.
- Nerve conduction study conducted by John Velez, MD on 7-20-2020. The impression reads, “Right S1 radiculopathy”.
- Records from Precision Medical Arts of NY, the practice of Juan Jose Gilbert Fernandez, MD. The records describe a right forehead hypertrophic scar with a neuroma; left upper back suture abscess.”
- Report of operation from Long Island Community Hospital. The surgeon is Juan Jose Gilbert Fernandez, MD and is dated 10-6-2020. The procedure is excision of right forehead scar 5 cm, excision of neuroma with supratrochlear nerve neurolysis.”
- Records from Orlin & Cohen Medical Specialists Group. Initial evaluation by John Feder, MD dated 7-22-2020. The “location of the patient’s problem is left knee.” The assessment reads, “closed fracture of neck of metatarsal bone of right foot, initial encounter.

Fausto Deleg v. Key Court Condominium et. al.

Impingement syndrome of right ankle. Impingement of left ankle joint.” Evaluation by orthopedist John Feder, MD dated 4-28-2021 describes “fracture of unspecified metatarsal bone(s), right foot, sequela (S92.301S), Procedure physical therapy; home exercise program.” The patient complaint reads, “WC 6-2-20 fell from scaffold 6 feet. R ankle and foot. Seen @ Winthrop Hospital. No prior injuries.”

- Records from Medihealth Medical, P.C. A neurological consultation dated 8-3-2020 performed by Ahmed Elfiky, MD included the impression “postconcussion syndrome with loss of consciousness, persistent headaches, vertigo and an intermittent foggy-like sensation; decreased concentration and short term memory problems” An EEG was recommended which was conducted 8-3-2020. The impression is “normal EEG, mostly awake.” The history reads, “He lost consciousness for 1-2 minutes and suffered a scalp laceration”. Follow-up appointments occurred on 8-20-2020 during which time he presented with “complaints of throbbing headache for three days. He states that the throbbing in the ear is concerning him the most.” The note reads, “EEG 8-3-20: Borderline compatible with post concussion syndrome.” Post concussion syndrome with loss of consciousness remained one of several diagnostic impressions. An MRI brain w/o contrast to rule out cerebral pathology was recommended. Neurological follow-up examination on 12-24-2020 described complaints including “right sided throbbing headache with dizziness and intermittent foggy-like sensation; decreased concentration and short term memory problems.” Follow-up examination dated 1-27-2021; chief complaints are unchanged from prior encounters. Results from an MRI of the brain dated 10-19-2020 were described as “normal”. Follow-up consultation note of 2-24-2021 continues to describe complaints of “right sided throbbing headache associated with dizziness and intermittent foggy-like sensation; decreased concentration and short term memory problems.” Further follow-up appointments occurred 3-24-2021; 4-28-2021; 5-26-2021; and 6-23-2021. Chief complaints on 6-23-2021 continued to include “right sided throbbing headache associated with dizziness and intermittent foggy-like sensation; decreased concentration and short term memory.” Diagnostic impressions included “post-concussion syndrome w/persistent headaches.”
- Records from Long Island Community Hospital dated 10-6-2020. Mr. Deleg underwent a right forehead scar excision. A history and physical dated 10-1-2020 describes “depression” in the section titled past medical history.
- Records from Long Island Psychological Consulting, P.C., the office of Roy Aranda, Ph.D., JD. The initial date of service is 7-20-2020. The psychological report indicates the referral was from John Velez, MD “pursuant to emotional trauma stemming from an occupational injury that occurred on 6-2-2020”. The examination occurred via teletherapy. Occasional alcohol use was reported. The diagnosis based upon presenting complaints was post-traumatic stress disorder, unspecified. The diagnosis was rendered solely based on patient complaints; no standardized measures were used. The recommendation was for psychological treatment consisting of supportive therapy, stress management, cognitive behavior therapy, and monitoring of cognitive functioning. Session notes for dates of service 7-30-2020 through 4-19-2021 were reviewed. Recurrent themes include complaints of pain and anxiety especially about COVID. The therapeutic modalities listed include support and relaxation therapy.

Fausto Deleg v. Key Court Condominium et. al.

- Records from the office of Barry Katzman, MD. Dr. Katzman performed left knee surgery on 6-18-2021 and provided follow-up care. The record of 6-3-2021 reads, “He did not lose consciousness and went to Winthrop Hospital where he was treated and released.” The diagnoses are bilateral knee sprain; left knee medial meniscus tear.” The note of July 10, 2020, reads, “The patient does not smoke and drinks occasionally.”
- Records from Kalter Physical Medicine and Rehabilitation. The initial evaluation is dated 8-3-2020 and chief complaints include headache, low back pain, hip pain, knee pain, foot and ankle pain and numbness.” He was described as having “normal mood and affect.” Diagnostic impressions include lumbar radiculitis, thoracic radiculitis, right hip oa, right ankle sprain, left knee sprain.” The last follow-up appointment is dated 5-27-2021 and the impressions at that time were lumbar radiculitis / spondylosis, cervical spondylosis / radiculitis / thoracic radiculitis, right hip oa, right ankle sprain, left knee sprain.
- Records from Fifth Ave Surgery Center.
- Select records from the NYS Workers Compensation Board including health provider authorizations, and correspondence to Boccia and certification of liability insurance.
- Payroll Journal
- Ambulance record – Mineola Volunteer Ambulance Corp. The patient is Fausto Gonzalo. The date is June 2, 2020. The patient was described as unable to walk without assistance. A stretcher was used, the purpose being “head/neck/back pain.” He was moved via “backboard-carry” in a supine position. The call was dispatched as a “traumatic injury.” He was transported to NYU Winthrop Hospital Emergency Department. The record reads, “30 YOM Pt found lying supine in middle of street awaiting EMS transport to NYU Winthrop for a trauma evaluation. Pt notes he was carrying concrete up an unstable scaffold that collapsed on top of him. Construction manager notes an off duty HHA maintain cervical stabilization prior to EMS arrival. Upon arrival, Pt is AOx4 and complaining of remarkable (+) ‘10/10’ pain to lower left leg distal to knee w/ diminished motor function.” Facial bleeding was noted. The record states “(-) LOC.” Elsewhere in the record it reads “Loss of consciousness: No.”
- Records from Alpha 3T MRI include an MRI of the thoracic spine and lumbosacral spine. A Document titled technologist questionnaire. “Brain” is written in section 4 in response to the query, “surgery which relates to current problem?” A notation at the bottom of the form reads, “Pt did not have brain surgery – just sutures.” It is dated 6-14-2020.
- File from the NYS Insurance Fund
- File from the NYS Workers’ Compensation Board. Most records described above were included in that file. Additional records reviewed include:
  - Orthopedic IME’s performed by Louis C. Romeo, MD dated 1-4-2021, 9-13-2021 who found a 50% degree of disability.
  - Records from Long Island Psychological Consulting, PC for dates of service 4-26-2021 through 7-26-2021. Depression is noted on 5-24-2021 due to the loss of his grandfather. PS-4 identifies the diagnosis of post-traumatic stress disorder. The disability estimate is “partial, marked psychological disability.” The PS-4 forms state “psychological therapy” in the section that requests a response to “Patient Condition and progress”.

Fausto Deleg v. Key Court Condominium et. al.

- WC Hearing information dated 2-1-2021 which indicates ANCR: amended to include the head and post-concussion syndrome. PTSD is established. The claimant raises TBI.”
- Psychiatry IME conducted by Alain De La Chapelle, MD dated 11-3-2020. Diagnostic impressions include post-traumatic stress disorder and major depression, which were viewed to be causally related to the 6-2-2020 incident.
- Orthopedic IME conducted by Peter J. Spohn, MD dated 10-15-2020. Impressions reads, “head injury, this is not my specialty and will not be discussed further; Contusion to the left forearm, now resolved; Contusion to the bilateral lower leg, now resolved; Contusion to the bilateral feet, now resolved.” He was found to have no evidence of an orthopedic disability.
- MRI of the brain dated 10-19-2020. The impression reads, “No evidence of an intracranial mass or focal signal abnormality within the brain. Severe pansinusitis with near complete opacification throughout the paranasal sinuses.”
- Records from NYU Langone Health System (Winthrop Hospital) dated 6-2-2020. The arrival complaint is “Fall.” Diagnoses on initial encounter are facial laceration, contusion of head, unspecified part of head.” The care timeline indicates that arrival was at 6-2-2020 at 11:21 and discharge was at 6-2-2020 at 23:25. Anxiety is noted throughout visit – valium 5mg IV is given. Forehead laceration was repaired in the trauma bay. The mechanism of trauma is “Scaffolding on work site fell onto the patient.” GCS is 15. “Focal complaints to left hip, left quadriceps, right forefoot among others” was noted. The ED discharge note reads, “30-year-old male s/p crush injury from scaffolding falling onto of him (sic), no LOC, no fall. Patient hemodynamically stable en route to hospital and throughout trauma bay course. He was evaluated with CT scans of head, C/T/L spine, chest, abdomen, pelvis, and bilateral lower extremities. Initial CT imaging is negative for traumatic injury. Follow-up evaluation, patient exhibited midline tenderness in the cervical spine. He went for MRI of cervical Spine was negative for fracture, subluxation, ligamentous, or spinal cord injury. Cervical collar was cleared. He continues to state he is sore all over his body. Patient specifically denies chest pain, shortness of breath, abdominal pain, and numbness /tingling/weakness in bilateral upper and lower extremities. Patient is voiding, eating, and ambulating without difficulty. Patient safe to discharge home at this time. Patient advised to follow-up with his PMD for evaluation.”
- Record from Winthrop Hospital dated 6-12-2020 indicates a visit for “suture removal”. The comments read, “small laceration to forehead s/p suture repair, appears to be healing well. No drainage or bleeding.” The Plan section reads, suture removal. Patient to f/u at trauma clinic. The patient’s current pain assessment and goals for pain management are: No pain is reported to me at this time.” “Number of sutures removed: 6”.
- Results from NYU Langone Radiology at NYU Winthrop Hospital including head CT findings dated 6-2-2020. The impression is “No acute traumatic injury to brain, spine, chest, or abdomen/pelvis.”
- Records from Brookhaven Pharmacy, and Breaks and Braces, Inc

Fausto Deleg v. Key Court Condominium et. al.

***History of present illness and/or current symptoms***

I asked Mr. Deleg to describe details of the June 2, 2020 accident. He said his work involved construction and demolition, and that he and others were demolishing a ramp in a parking lot. A delivery of “decks” was received. He was working with three other people at the time. He wanted to use a lift of some type but was told to use scaffolding. The scaffold broke and fell on top of him. He said the scaffold was made from metal. I asked if he recalled the scaffold falling on him, and he replied, “yes.” I remember my whole body was hurting.” He recalls feeling nervous. He was taken by ambulance to Winthrop hospital because, “I was bad.” His father Klever Deleg, worked with him at the time of injury. He was lying on the ground after the material fell onto him. He recalled that “my whole body was hurting.” Pictures taken by coworkers at the time of the incident were given to Mr. Deleg’s father who in turn showed them to him.

I asked Mr. Deleg what injuries he experienced. He said he sustained a laceration on his forehead, and cuts to his back and neck.

Mr. Deleg recalled that he remained in the hospital until about 11:30 PM. The incident he said happened at approximately 10:00 AM.

While in the Winthrop Hospital emergency department, Mr. Deleg reported that he received stitches to his forehead. He was unable to recall what procedures were performed on his neck and back. He recalled that some imaging procedure(s) may have been conducted. He said that pain in his left knee, lower back and neck were amongst his complaints at the time. A nurse, he said, provided him with a pair of blue pants and then he was sent home. The pants he was wearing at the time of the injury were cut off and were returned to him upon leaving the hospital.

Mr. Deleg could not recall whether the emergency department staff prescribed any medications, nor did he remember what recommendations for follow-up care were provided. He did recall that the doctor described his leg pain as being from cramps, and that movement would be the remedy for his condition. He felt that his complaints were not taken seriously.

Mr. Deleg was driven home by his father. His father was not present when medical care was being provided. COVID guidelines were in force, and visitors including family members were not allowed into the treatment area.

Mr. Deleg did not receive further medical care until about 1 to 1-1/2 weeks later, when he sought consultation with “Dr. Velez for therapy”. He thinks Dr. Velez was an orthopedist but was uncertain. The reason he pursued consultation was because “I couldn’t take the pain” so he was referred to Dr. Velez by his attorney. Mr. Deleg said that he pursued consultation about 2-3 days prior to his initial appointment with a different doctor, but the clinic did not accept workers’ compensation. The pain he recalled was in his right knee, right ankle, right toes, hip, lower back, neck, and his forehead. He also pointed to his right clavicular region to describe the pain he had at that time.



Fausto Deleg v. Key Court Condominium et. al.

Physical therapy services were recommended by Dr. Velez, which he received three times per week, and physical therapy continues to be received at a reduced frequency of twice per week.

Dr. Velez is no longer following Mr. Deleg. His care was assumed by a different physician, whose name he could not recall.

Mr. Deleg has been followed by other physicians. He underwent plastic surgical revision to his head scar in October 2020. He required a procedure because the area of his wound developed exudate and became swollen, so a procedure was required.

Mr. Deleg underwent left knee surgery performed by Dr. Katzman in the summer of 2021. This was a same day procedure.

He underwent lower back surgery performed by Dr. Ratzker in November 2021. He needed to stay in the hospital for three days.

Mr. Deleg continues to be followed by an orthopedist, Dr. Feder, for pain in his feet and toes.

He is followed by orthopedist Stanislav Aushalumov, MD. He is also followed by Neurologist Ahmed Elfiky, MD for right sided head pain.

Mr. Deleg is also treated by Dr. Kalter, a pain management physician, with visits once every 4 weeks.

I asked Mr. Deleg to delineate what symptoms or problems he continues to experience resulting from the accident. He reported:

- Pain in his lower back and hips. He said, "I can't do movements."
- Pain and mobility restrictions in his left knee
- Pain in his neck and the right side of his head

I asked if there were any other problems that he failed to mention. In response, Mr. Deleg said:

- "Emotionally, I'm always nervous. Some days are good, some days are not so good."

I again asked if there were any additional problems or symptoms and he replied, "No other problems. Those are all the problems."

### ***Psychiatric history***

Mr. Deleg is treated by Roy Aranda, Ph.D., JD, a psychologist, for mental health therapy. He first met Dr. Aranda about two years ago and sessions occur once per week through a telephonic or audio-video connection. Mr. Deleg has not met Dr. Aranda in person but said he would if invited to do so. He said sessions provide him with an opportunity to discuss his feelings and that

Fausto Deleg v. Key Court Condominium et. al.

exchanges leave him with a hopeful attitude. He focuses on relaxation techniques including what were described as breathing exercises.

Dr. Aranda referred Mr. Deleg to psychiatrist Christina Vaglica, DO about 8-12 months ago for consultation. He meets with Dr. Vaglica every 2 months.

Mr. Deleg reported no history of mental health treatment prior to the work accident.

### ***Substance abuse history***

Substance abuse was denied. He occasionally consumed alcoholic beverages prior to the work accident, in moderation, but subsequently, said that he has completely refrained from consuming alcohol. He does not use tobacco products.

### ***Family and social history***

Mr. Deleg immigrated from Ecuador to the US in 2007. He was 17 years old at the time and came by himself. His parents previously came to the US, his father as early as 1993, according to what he was told. Prior to moving to the US, he lived with his mother in Ecuador, until she immigrated, and then for a period he lived with his sister. He has three sisters and one brother. Mr. Deleg is the youngest. His family all reside in the US, but in different states.

Mr. Deleg currently resides with his wife, who he married in 2022. He met his wife in 2013, and they have lived together for much of the time since 2014. Together, they have two children, a daughter who is 3 years old and a son who is 8 years old. His wife works in a factory. His children are healthy. I asked how his marriage is going, and he replied, "The marriage is good. We don't have problems. Just my health is a problem."

Mr. Deleg does not have contact with his former coworkers, except for his father.

### ***Educational/Employment history***

Mr. Deleg was completing his fourth year of High School by the time he left Ecuador to come to the US. He did not graduate. He has not received additional education. He reported no history of learning disorders or neurodevelopmental conditions.

Mr. Deleg has not yet returned to work.

Mr. Deleg had been with his employer full-time for a period of about 7-8 years and was working full-time when the accident happened. His work involved restoration and involved the use of bricks and cement. He reportedly enjoyed his work. Other jobs include warehouse work until



Fausto Deleg v. Key Court Condominium et. al.

2012, which he did while residing in Atlanta. At no time, Mr. Deleg said, has he ever been fired from a job.

I asked Mr. Deleg about his plans to return to work. His preference would be to return to work, but he cannot see himself being able to do so, which he said is a source of distress.

### ***Military history***

Mr. Deleg reported no history of military service.

### ***Legal history***

Mr. Deleg reported having a clean record devoid of any past criminal law or civil legal entanglements.

### ***Medical history/medications***

Current medications include gabapentin, meloxicam, cyclobenzaprine, escitalopram, and topiramate. He was not taking medications during the period when the work accident happened.

Mr. Deleg reported no history of surgical procedures prior to the work accident. He viewed himself to be healthy and without a history of chronic medical disorders.

There were no prior work injuries reported.

Mr. Deleg reported no history of motor vehicle collisions.

### ***Current functioning/activities of daily living (ADLs)***

Mr. Deleg drives, but difficulty with prolonged sitting limits the duration of his travel. He does drive to therapy appointments by car, but the office is a short distance from his home.

Socially, Mr. Deleg said that family members are his friends, including cousins and other members of his large family.

Mr. Deleg's wife manages the finances whereas before the work accident, he oversaw that activity. Bills are reportedly paid in person by his wife.

He last flew in a plane in 2018-2019 when he travelled to Atlanta.

Mr. Deleg's wife prepares meals, although he helps to some degree. His wife prepares meals for him to eat during the day, and when they require warming, he will perform that task.

Fausto Deleg v. Key Court Condominium et. al.

I asked Mr. Deleg to provide insight into his intimate relationship with his wife. He said “Right now it’s about 15-20%. Before we had a more active sex life.”

***Examination: methods used***

- Mental status examination
- Trauma Symptom Inventory – 2 (TSI-2) Spanish Administration via PARconnect
- Minnesota Multiphasic Personality Inventory – 3 (MMPI-3) Spanish-language version
- Test of Memory Malinger (TOMM)

***Examination findings***

Mr. Deleg was driven to the examiner’s office by a family member and was driven home upon its completion. The examination began at 11:00 AM and ended at approximately 3:30 PM. At 1:57 PM, he was asked if we could go for about another 90 minutes or so, and he said he would be able to do so. Breaks were taken as requested, including for use of the bathroom. Mr. Deleg occasionally rose from his seat to walk about the office when he felt a need to do so. On occasion he would briefly stand, shake his right leg, and return to a seated position. He had no difficulty using a mouse to interact with the computer during administration of the TSI-2. He accepted a water bottle from the examiner.

Mr. Deleg presented as an alert and oriented man, right-handed, who arrived wearing a facial mask. He had a tattoo on his left forearm and middle finger of left hand. A scar was noted on his forehead in the area over his right eye. He wore eyeglasses.

Mr. Deleg said that sleep is variable. Some nights he will get a full 8 hours of sleep while on other nights’ sleep is limited to about 3-4 hours. He will take medications when needed to help him fall and stay asleep. He did not report nightmares. His appetite is good, noting that “I feel like I always want to eat.” He reported his current weight as 185-190 pounds standing 5’8” tall. He could not recall his weight at the time of the work accident.

Mr. Deleg denied hallucinations although said that “I see things that are passing by like a shadow.” He denied thoughts of self-harm but recalled the reason for psychiatric referral related to suicidal thinking at that time.

I asked about anxiety symptoms, because he identified feelings of nervousness among the list of persistent problems. He said that anxiety “comes and goes. I get jittery then I want to eat.” Symptoms can come on a weekly basis or every other week. When he sleeps well, and pain is less severe he said, he can manage anxiety symptoms. He has been advised to eat green fruits, apples, and seeds as a way of controlling anxiety. Mr. Deleg said that when he thinks about his children, anxiety symptoms and sadness are more likely to emerge. He said feeling sad tends to bring on anxiety.

Fausto Deleg v. Key Court Condominium et. al.

I asked Mr. Deleg if he has symptoms of depression. He said that anxiety is the concern, not depression.

His affect was mildly restricted in range.

Mr. Deleg was administered three measures whose purpose was to provide additional clarity of his condition.

His performance on the Test of Memory Malinger (TOMM) exhibited a significant failure, as scores on the three trials were consistently at or near chance levels and well below the established cutoff threshold stipulated by this assessment tool. Stated differently, his performance was non-credibly poor (Trial 1 = 26; Trial 2 = 32; Trial 3 = 30) with associated specificity values at or near 100%<sup>1</sup>.

Results of the TSI-2 were also consistent with a tendency to over-endorse symptoms (ATR Raw Score = 9<sup>2</sup>; T = 83; 97<sup>th</sup> %ile TRAUMA Raw Score = 66; T = 65; 91<sup>st</sup> %ile).

The MMPI-3 was used to add additional clarity about Mr. Deleg's psychological condition. Results from this measure also provided findings that were consistent with symptom over-reporting (FS T = 96; FBS T = 97; RBS T = 101). Mr. Deleg provided a larger than average number of infrequent responses to the MMPI-3 items (F = 79) and an atypical combination of responses that is associated with non-credible reporting of somatic and cognitive symptoms (FBS = 97; RBS = 101). His responses describe somatic symptoms that are rarely reported by individuals with genuine medical conditions (Fs = 96). These validity indicators suggest that scores on content scales, including those measuring somatic complaints, malaise, neurological complaints, and cognitive complaints are unlikely to reveal valid depictions of Mr. Deleg's actual functioning. Likewise, his responses to the MMPI-3 are discrepant from mental status findings and statements made about his core emotional functioning, which speaks further to protocol invalidity.

### **Summary**

Fausto Deleg is a 33-year-old man who submitted to psychological examination at the request of defense counsel. He is the plaintiff in a lawsuit related to a work incident that occurred on June 2, 2020. He alleges a range of physical and mental impairments related to that event.

A certified translator was in attendance throughout the entirety of the examination, ensuring accurate and precise communication between all parties involved.

---

<sup>1</sup> Martin, Schroeder, Olsen, Maloy, Boettcher, Ernst & Okut (2020) A systematic review and meta-analysis of the Test of Memory Malinger in adults: Two decades of deception detection, *The Clinical Neuropsychologist*, 34:1, 88-119.

<sup>2</sup> ATR scores  $\geq 7$  are associated with symptom over-reporting with an associated specificity of  $\geq 90\%$ . Henry & Gornbein (2022) Posttraumatic stress disorder and noncredible symptom reporting on the Trauma Symptom Inventory-2, *Applied Neuropsychology: Adult*, 29:1, 100-105.

Fausto Deleg v. Key Court Condominium et. al.

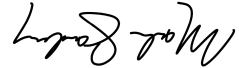
Record review shows that he sustained a head wound on the date of injury and was taken by ambulance to Winthrop Hospital for examination and treatment. Tests were conducted while in the emergency department, during which time he complained of anxiety and pain in various body sites. Six sutures were used to close a head wound. Ten days after the injury, Mr. Deleg returned to Winthrop Hospital for the purpose of suture removal. The wound was described in the hospital record as a "small laceration." He did not voice complaints of pain during that visit. Mr. Deleg has not returned to his work since the date of injury. During this examination, he described pain in various areas of his body including his left knee, neck and head, lower back, and hips. He also reported persistent feelings of nervousness that vary in severity depending upon the day.

Despite orientation at the outset of the examination to try his best and to respond to examination items in a way that accurately reveals his underlying functioning, performance on various tests was non-credibly poor or revealed over-reporting. Mr. Deleg was administered a measure of recognition memory for visual, nonverbal stimuli on which testing was performed immediately after presentation of the information and after a delay. This measure is typically performed well including by persons with concussive injuries, psychiatric illness, or even mild forms of dementia. Mr. Deleg's performance was not credible with classification accuracy at or near 100%. Findings from two other administered measures also revealed response patterns consistent with noncredible reporting of symptoms, including those of a somatic and cognitive nature.

Mr. Deleg did not describe a loss or alteration of consciousness at the time of injury. The records reviewed, including the police report and those from the Winthrop Hospital Emergency Department, do not reveal mental status abnormalities suggestive of a concussion. Mr. Deleg's account of the incident includes memory of being hit by the falling material. In consideration of those data sources, there is no basis to conclude that Mr. Deleg sustained a concussion at the time of injury. Some provider encounter notes reviewed document a loss of consciousness, but those notes are discrepant from police and ED records, which would be considered most reliable given their proximity to the incident. The first consideration of postconcussion syndrome seemed to emerge from a neurology consultation. Those records described a normal EEG and then subsequent notes described EEG findings as "Borderline compatible with post-concussion syndrome." During this examination, Mr. Deleg did not complain of cognitive difficulties when given the opportunity to describe his residual problems stemming from the incident. He does not meet the criteria for postconcussion syndrome.

Mr. Deleg described feelings of nervousness, and anxiety symptoms were noted in the ED records reviewed, and have been a focus of psychotherapy support which was initiated on 7-20-2020. Psychotherapy records reviewed provide no indication to support the diagnosis of post-traumatic stress disorder. Apart from Dr. Aranda's initial consultation report which presents patient complaints, the records reviewed do not describe intrusion symptoms or dissociative reactions. Avoidance behaviors which were described by Dr. Aranda relate to other factors including COVID-19. Negative alterations in mood, namely in the form of nervousness, was reported by Mr. Deleg. However, it would be speculative to conclude that a causally related psychiatric disorder exists given his tendency toward impression management which objective testing revealed during this examination.

Mark A. Sandberg, Ph.D., ABPP, ABN  
Board Certified in rehabilitation psychology  
Board Certified in neuropsychology  
NYS License No.: 010083



Sincerely,

I, Mark A. Sandberg, Ph.D., certify that the conclusions and opinions contained in this report are believed to be true with a reasonable degree of psychological certainty.

Please do not hesitate to contact me if you have any questions or if I could be of further assistance.

No DSM-5 diagnoses are indicated by examination findings.

### ***Diagnostic impressions***

In summary, information drawn through interview and record review does not support the position that Mr. Deleg sustained a concussion at the time of the work incident on June 2, 2020. The diagnosis of postconcussion disorder is therefore not plausible. Complaints of nervousness were voiced by Mr. Deleg during this examination and anxiety is a condition which was noted in psychotherapy notes reviewed. Neither his reported symptoms nor mental health encounter notes however, give indication of posttraumatic stress disorder. Symptoms of intermittent nervousness and anxiety which he did describe, exist in the context of invalid symptom validity testing.

# EXHIBIT I

MATTHEW M. SHATZER, DO, PHYSICAL MEDICINE & REHABILITATION

June 1, 2023

Claimant: Miguel Ovalles Diaz

[REDACTED]

Date of Accident: 1/26/18

Date of Evaluation: 4/12/23

To Whom It May Concern,

I had the opportunity to perform a Physical Medicine and Rehabilitation re-evaluation of Mr. Miguel Ovalles Diaz on April 12, 2023. Mr. Diaz was accompanied by Lizbeth Medina, who identified herself as his legal representative. Also present was Aldo Cabanillas, Spanish interpreter from Craney Interpreting.

[REDACTED]

[REDACTED]

- 1) [REDACTED]
- 2) [REDACTED]
- 3) [REDACTED]
- 4) [REDACTED]
- 5) [REDACTED]
- 6) [REDACTED]
- 7) [REDACTED]
- 8) [REDACTED]
- 9) [REDACTED]
- 10) [REDACTED]
- 11) [REDACTED]

# EXHIBIT J



DCS/meb

609954/21E

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,  
and IME COMPANIONS LLC,

Defendant.  
-----X

**RESPONSE TO  
SUBPOENA TO PRODUCE  
DOCUMENTS, INFORMATION,  
OR OBJECTS OR TO PERMIT  
INSPECTION OF PREMISES IN A  
CIVIL ACTION**

Case No.: 1:22-cv-1032

S I R S:

Defendant/Third-Party Defendant, BI-COUNTY SCALE & EQUIPMENT CO., LLC, by its attorneys, MARTYN, SMITH, MURRAY & YONG, ESQS. as and for a Response to the Subpoena to Produce documents, Information, or Objects or to Permit Inspection or Premises in a Civil Acton dated March 22, 2024, sets forth the following upon information and belief:

1. Annexed hereto is a copy of the report of Teresa Habacker MD dated May 18, 2023.
2. Annexed hereto is a copy of the report of Teresa Habacker MD dated May 18, 2023.
3. Respondent is not in possession of any of the requested information as the subject medical examination was not conducted at the behest of the within Respondent. Upon information and belief, the medical examination was arranged by the following:

LAW OFFICE OF ERIC D. FELDMAN  
Attorneys for Third-Party Defendant  
PEACH MARKET, INC.  
P.O. Box 2903  
Hartford, CT 06104-2903  
(631) 501-3100

4. Respondent is not in possession of any of the requested information as the subject medical examination was not conducted at the behest of the within Respondent. Upon information and belief, the medical examination was arranged by the following:

LAW OFFICE OF ERIC D. FELDMAN  
Attorneys for Third-Party Defendant  
PEACH MARKET, INC.  
P.O. Box 2903  
Hartford, CT 06104-2903  
(631) 501-3100

Dated: Hauppauge, New York  
April 22, 2024

Yours & etc.,

MARTYN, SMITH, MURRAY & YONG, ESQS.  
Attorneys for Defendant(s)  
BI-COUNTY SCALE & EQUIPMENT CO.,  
102 Motor Parkway, Suite 230  
Hauppauge, New York 11788  
516-739-0000

TO: Milman Labuda Law Group PLLC  
3000 Marcus Avenue, Ste 3W8  
Lake Success, NY 11042  
(516) 303-1391

**Teresa Habacker, M.D.**  
Board Certified Orthopedic Surgeon

---

309 High Street, Port Jefferson, NY 11777

Law Office of Eric Feldman  
P.O. Box 2903  
Hartford, CT 06104

May 18, 2023

RE: Cuaxil, Rafael Antonio  
Date of Accident: 6/15/2020  
DOB: 5/13/1998  
Claim #: FQE2709

To Whom It May Concern,

I am an orthopedist duly licensed to practice orthopedics in the State of New York. As per your request, I performed an independent examination in the specialty of orthopedics on Mr. Cuaxil on April 19, 2023 in my Bayside office. The claimant was examined in a manner necessary to evaluate his subjective complaints and was examined in accordance with the restrictive rules concerning an independent medical evaluation. The claimant was aware that no doctor/patient relationship exists or is implied by this examination. The claimant was accompanied into the examination room by an interpreter, Andrew Lezcano of American Legal Languages and a legal representative, F. Gutierrez.

Recommendations as per the CDC were followed strictly. Claimants were required to fill out a COVID-19 questionnaire. Anyone at risk was instructed to reschedule. Claimants were asked to enter the office alone (unless the claimant was a minor and/or in need of an interpreter.) Claimants were asked to complete intake paperwork in their cars and call the office when complete. Claimants were brought into the office when the exam room was vacant. In the event that the claimant arrived via public transportation, he or she was allowed to complete paperwork in the waiting room, the hallway, or a vacant exam room. All were spaced out 6 feet while in the examination room. The doctor wore new gloves for each examination and further cleaned her hands between examinations. Sanitizer was readily available. Between claimant examinations, door handles, clip boards, pens, exam room tables, and all the equipment were sanitized with medical grade wipes.

Re: Cuaxil, Rafael Antonio (DOA: 6/15/2020)

Pg.2

The claimant's photo ID was presented and copied. The claimant was advised about the nature of the IME, with the understanding that if during the course of the examination there is pain or discomfort, to inform the physician. My findings are as follows:

**HISTORY AS RELAYED BY THE CLAIMANT:**

Mr. Rafael Antonio Cuaxil stated that on 6/15/2020, he was working in his usual capacity as a butcher, where he had been employed for 4 months. He describes the accident as follows: He was using a meat grinder and the grinder machine caught his index, middle, and ring fingers on his right hand. The claimant left work and sought medical attention. He was bleeding. He was taken by ambulance to Bellevue Hospital ED. He was admitted and underwent surgery on the right hand. The claimant suffered amputations of the fingers index, middle and ring fingers on the right hand. He was discharged the next day.

The claimant's had revision surgery on the right hand on 11/4/2020 with revision amputation of the right toe, too finger transplantation. The claimant states he had surgery to the left foot, right foot and right hip. He had four surgeries in total.

In February, 2021 he began physical/massage therapy 2 times per week which he reports had led to improvement. His therapy ended in September, 2022.

He has not had any further treatment since 2021. He has a prosthesis for the hand at home.

The claimant denied a subsequent injury or accident.

**PRESENT COMPLAINTS:**

At present, he reports the following chief complaints: Right hand and right foot symptoms. He states his condition has improved since beginning his treatment plan.

**PAST MEDICAL HISTORY:**

Mr. Cuaxil reported he was never involved in an auto or work-related accident prior to this accident. He denied any other prior history of traumatic injuries. He denied any prior unrelated surgery. He denied any illnesses or health conditions.

**CURRENT MEDICATIONS:**

The claimant stated that he takes no prescription or over the counter medication related to this accident.

Re: Cuaxil, Rafael Antonio (DOA: 6/15/2020)

Pg.3

**OCCUPATIONAL STATUS /SOCIAL HISTORY:**

Mr. Cuaxil reported that he was working full-time as a butcher (cut meat, lifting and walking) at the time of the accident. He described his job duties as requiring regular heavy/light lifting, never sitting and regular walking. He has not worked in any capacity since the time of the accident. His hobby is bike riding, dancing and reading.

**REVIEW OF MEDICAL RECORDS:**

I had the opportunity to review the following medical records:

- Verified Bill of Particulars
- Responses to Notice for Discovery and Inspection
- Response to Notice to Take Deposition Upon Oral Argument
- Response to Demand for Statement of Monetary Damages
- Response to Demand for Medical Information
- Response to Demand for Disclosure as to Medicare/Medicaid Liens
- Barry Katzman, MD – office visit: 1/13/21
- Behavioral Medicine Associates; Maria Segin, Ph.D.; office visit: 8/10/21
- Behavioral Medicine Associates; Test Selection Rationale
- Bellevue Hospital ED report, brief OP note, 11/4/2020
  - Procedure:
    - Revision amputation right toe to finger transplantation.
- Omri Ayalon, MD – office visit: 11/17/20, 11/30/2020, 12/15/20, 1/4/21, 1/26/21, 2/23/21, 4/27/21, 7/19/21, 8/24/21, 10/26/21, 1/24/21, 2/15/22
- Provider Flow Med records Request

**REVIEW OF FILMS:**

I had the opportunity to review the following films:

- 2020-06-15 X-RAY RT HAND, 4 views
  - Impression:
    - Index amputated through the base of the proximal phalanx
    - Middle amputated through the mid-proximal phalanx
    - Ring amputated through the distal aspect of the proximal phalanx
- 2020-06-15 X-RAY RT FINGERS, 3 views
  - Impression:
    - Index amputated through the base of the proximal phalanx
    - Remainder of index visualized with separation at the dip as well
    - Middle amputated through the mid-proximal phalanx

Re: Cuaxil, Rafael Antonio (DOA: 6/15/2020)

Pg.4

- Remainder of middle visualized with comminution of the remainder of the proximal phalanx and subluxation of the dip
- Ring amputated through the distal aspect of the proximal phalanx
- Remainder of the ring including subluxation of the dip and distal phalanx fracture
- 2020-07-06 X-RAY RT HAND, one view
  - Impression:
    - Index amputated through the base of the proximal phalanx
    - Middle amputated through the mid-proximal phalanx
    - Ring amputated through the distal aspect of the proximal phalanx
- 2020-10-02 X-RAY RT HAND, 3 views
  - Impression:
    - Index amputated through the mid metacarpal
    - Middle amputated through the base of the proximal phalanx with staples
    - Ring amputated through the distal aspect of the proximal phalanx
- 2020-11-20 X-RAY RT HAND, 3 views
  - Impression:
    - Index amputated through the mid metacarpal
    - Middle amputated through the base of the proximal phalanx with staples
    - Ring amputated through the distal aspect of the proximal phalanx with staples

#### **PHYSICAL EXAMINATION:**

Mr. Cuaxil is a well-developed, well nourished, 25-year-old right-handed Hispanic male with black hair, brown eyes, 5'3" tall and 205 pounds who presented with normal ambulation, no antalgia and good muscle tone. He was in no distress and demonstrated no difficulty getting on and off the examination table. He wore no orthopedic appliances. He has a right-hand prosthesis, which he left at home. There are no changes to the skin. There was no hyperesthesia, edema, perspiration, skin color changes, temperature or trophic changes. He was noted to have tattoos.

#### **HAND EXAMINATION**

Inspection of the hands revealed no erythema, deformity or edema. Palpation revealed no tenderness. There was no evidence of contracture or atrophy. There was no triggering. The joints were stable.



Re: Cuaxil, Rafael Antonio (DOA: 6/15/2020)

Pg.5

Right index, middle and ring fingers were amputated through the metacarpals.

Right small digital active range of motion measured with a goniometer:

metacarpophalangeal ext./flex. 0/90 degrees (0/90 degrees normal)

proximal interphalangeal ext./flex 0/90 degrees (0/100 degrees normal)

distal interphalangeal ext./flex 0/40 degrees (0/80 degrees normal)

- ASSH Guidelines (American Society for Surgery of the Hand)

Right thumb active range of motion measured with a goniometer:

palmar abduction 45 degrees (45 degrees normal)

metacarpophalangeal ext./flex. 0/60 degrees (0/60 degrees normal)

interphalangeal ext./flex. 0/80 degrees (0/80 degrees normal)

- ASSH Guidelines (American Society for Surgery of the Hand)

Left digital active range of motion measured with a goniometer:

metacarpophalangeal ext./flex. 0/90 degrees (0/90 degrees normal)

proximal interphalangeal ext./flex 0/100 degrees (0/100 degrees normal)

distal interphalangeal ext./flex 0/80 degrees (0/80 degrees normal)

- ASSH Guidelines (American Society for Surgery of the Hand)

Left thumb active range of motion measured with a goniometer:

palmar abduction 45 degrees (45 degrees normal)

metacarpophalangeal ext./flex. 0/60 degrees (0/60 degrees normal)

interphalangeal ext./flex. 0/80 degrees (0/80 degrees normal)

- ASSH Guidelines (American Society for Surgery of the Hand)

#### **NEUROLOGICAL EXAMINATION:**

Neurological evaluation of the upper extremities revealed the biceps, triceps and brachioradialis deep tendon reflexes to be not elicited. General sensation to light touch was normal over the upper extremities with the exception of reported reduced sensation of the right web space. There was no atrophy.

Muscle strength tested:

Deltoid 5/5

Biceps 5/5

Triceps 5/5

Wrist extensors 5/5

Flexors 5/5

\*Intrinsics 5/5, limited but good pinch

Re: Cuaxil, Rafael Antonio (DOA: 6/15/2020)

Pg.6

**DIAGNOSIS:**

Right thumb laceration

Right index finger amputation through the proximal phalanx revised through metacarpal

Right middle finger amputation through the proximal phalanx, s/p surgical repair, s/p revision amputation w/second toe transfer, failed, revised through metacarpal

Right ring finger partial amputation through the proximal phalanx revised through metacarpal

Right hand starfish procedure

**OPINION:**

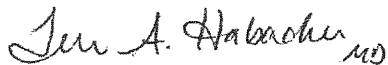
There are no known comorbidities that may affect the injuries described. The claimant's current medical status is inactive.

The claimant left the exam room, without complaints about the manner that the IME was conducted.

All opinions expressed are based upon a reasonable degree of medical certainty. The evaluation has been conducted on the basis of the history provided, the orthopaedic examination and the documentation as provided with the assumption the material is true and correct. If more information becomes available at a later date, additional service/ report/ reconsideration may be requested. Such information may or may not change the opinions rendered in the evaluation.

I, Teresa Habacker, M.D. being a physician duly licensed to practice orthopedics in the State of New York, pursuant to CPLR Section 2106 hereby affirm under the penalty of perjury that the statements contained herein are true and accurate.

Sincerely,



Teresa A. Habacker, M.D.

The independent medical examiner has reviewed the report, attests to its accuracy, and has affixed an electronic signature.

Lic. #:184539NY

cs/cs/cs



TERESA SCHULLY HABACKER, M.D.

5954 Route 25A

Wading River, NY 11792

631-473-4263

habackermid@eastendhandsurgery.com

Practiced as Teresa Schully, M.D.

10/1997 - 02/2010

PRIVATE PRACTICE

ORTHOPEDIC HAND SURGERY

East End Hand Surgery, Suffolk County, NY

02/2010 - present

Long Island Bone & Joint, Port Jefferson & Southampton, NY

09/2007 - 02/2010

Valley Hand Center, Modesto CA

03/2003 - 12/2006

Orthomed Center, Modesto CA

10/1997 - 03/2003

HOSPITAL / SURGERY CENTER AFFILIATIONS

SUFFOLK COUNTY, NY

Stony Brook University Hospital

06/2015 - present

Eastern Long Island Hospital

07/2010 - present

North Shore Surgery Center

10/2009 - present

Peconic Bay Medical Center

10/2009 - present

St. Catherine's of Siena

12/2009 - present

John T. Mather Memorial Hospital

03/2007 - present

St. Charles Hospital

03/2007 - present

Southampton Hospital

03/2007 - present

STANISLAUS COUNTY, CA

Doctors' Medical Center of Modesto

10/1997 - 12/2006

Memorial Hospital

10/1997 - 12/2006

Stanislaus Surgical Hospital

10/1997 - 12/2006

Valley Surgery Hospital

10/2004 - 12/2006

TEACHING APPOINTMENTS

Stony Brook University Hospital

06/2015 - present

Assistant Clinical Professor

EDUCATION AND TRAINING

Thomas Jefferson University, Philadelphia, PA

07/1996 - 06/1997

*Hand Surgery Fellowship*

Long Island Jewish Medical Center, New Hyde Park, NY

07/1993 - 06/1996

*Orthopaedic Surgery Residency*

Louisiana State University, New Orleans, LA

07/1992 - 06/1993

*Orthopaedic Surgery Residency*

State University of New York, Downtown, Brooklyn, NY

07/1989 - 06/1992

*Surgical Residency*

Medical College of Virginia, Richmond, VA

08/1985 - 05/1989

Ruth Jackson Orthopaedic Society

1992

#### PUBLICATIONS

---

Haynes, JH, Habacker TA\*, Johnson DE, Flood LC, Mast BA, Cohen JK, Diegelmann RF, Krummel TM: "Platelet Derived Growth Factor (PDGF) induces fibrosis at a fetal wound site." Federation American Societies Experimental Biology Journal, vol 4(3), part 1; Abstract 1277, February 1990

Habacker TA\*, Heinrich SD, Dehne R: "Fractures of the superior pelvic quadrant in a child: A case report and a review of the literature." *Journal of Pediatric Orthopaedics*, 1994

STATE OF NEW YORK: COUNTY OF SUFFOLK

:SS.:

I affirm this the 22nd day of April, 2024 under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law. That she is over the age of 18 years and a clerk in the office of MARTYN, SMITH, MURRAY & YONG, ESQS. the attorneys for BI-COUNTY SCALE & EQUIPMENT CO., LLC defendant/third party defendant herein; I served the annexed RESPONSE TO SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION upon undersigned attorneys by mailing a true copy in a postpaid wrapper in a post office box maintained by the United States, directed to them at the addresses shown, heretofore designated by them for that purpose.

NAME AND ADDRESS

ATTORNEY FOR


Milman Labuda Law Group PLLC  
3000 Marcus Avenue, Ste 3W8  
Lake Success, NY 11042  
(516) 303-1391

**Attorney Certification:**

Pursuant to 22 NYCRR 130-1.1, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief, and after reasonable inquiry, the contentions contained in the annexed document(s) are not frivolous.



\_\_\_\_\_  
David C. Smith



\_\_\_\_\_  
Maryellen Bonura

# EXHIBIT K

---

**From:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>  
**Sent:** Tuesday, April 16, 2024 8:06:18 PM  
**To:** Jamie Felsen <[jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)>  
**Subject:** RE: IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. | Case No.: 1:22-cv-1032

You don't often get email from [boris@freehill.com](mailto:boris@freehill.com). [Learn why this is important](#)

Good evening,

There were three (3) different IMEs conducted in *Mauricio Aguilar Saldivar v. Fay Sen Lee and Jian Mei Laundromat, Inc.* I have included screenshots of the relevant portions of the IME reports below, as well as an attachment I was provided from Dr. Chernoff's office. The only information I have about the representatives that appeared with the Plaintiff at the IMEs is below and attached. I have never communicated with them. I am unable to send copies of the IME reports as that would violate the Plaintiff's HIPAA rights, unless you are able to provide a duly executed HIPAA authorization from Plaintiff.

1. April 20, 2023 IME conducted by Andrew N. Bazos, M.D.

I performed an Independent Medical Examination on the claimant, Mauricio Aguilar Saldivar, in my Manhattan office on April 20, 2023. The claimant presented photo identification at the time of the examination. Prior to entering the exam room today, the claimant's file/medical records were reviewed as part of the examination performed. The legal representative was Mr. Abdelatif and the translator was Ms. Viteri.

Best,

**LAINA R. BORIS, ESQ. | FREEHILL HOGAN & MAHAR LLP**

80 Pine Street, 25th Floor

New York, N.Y. 10005-1759

Main: 212-425-1900 | Fax: 212-425-1901

Direct: 212-381-3002 | Mobile: 929-260-2740

E-mail: [boris@freehill.com](mailto:boris@freehill.com)

---

**From:** Jamie Felsen <[jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)>

**Sent:** Tuesday, April 16, 2024 7:46 PM

**To:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>

**Subject:** Re: IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. | Case No.: 1:22-cv-1032

Laina,

The subpoena was meant for you and not plaintiff's counsel. We are looking for a copy of the IME report which typically identifies the observer and the company that employs the observer. You can send it to me by email.

---

**From:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>

**Sent:** Tuesday, April 16, 2024 10:43:11 AM

**To:** Jamie Felsen <[jamiefelsen@mlaborlaw.com](mailto:jamiefelsen@mlaborlaw.com)>; Jamie Felsen <[jamiefelsen@mlaborlaw.com](mailto:jamiefelsen@mlaborlaw.com)>

**Subject:** IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. | Case No.: 1:22-cv-1032

You don't often get email from [boris@freehill.com](mailto:boris@freehill.com). [Learn why this is important](#)

Good morning,

Our office received the attached subpoena yesterday. I think it may have been improperly addressed to us as we do not represent the Plaintiff in *Mauricio Aguilar Saldivar v. Fay Sen Lee and Jian Mei Laundromat, Inc.*, Index No. 520616/2018. Rather, we represent the Defendants in that action. I can try to help the best I can, but as defense counsel, I am not usually provided any information about the representative that goes with the plaintiffs to the IMEs. I have included Plaintiff's counsel's information below.

GINARTE GALLARDO GONZALEZ WINOGRAD, LLP

Attn: Frank Pintauro, Esq.

The Woolworth Building

[233 Broadway – 24th Floor](#)

[New York, New York 10279](#)

T: (212) 601-9700

[fpintauro@ginartelaw.com](mailto:fpintauro@ginartelaw.com)

Please feel free to call me at 929-260-2740 if you would like to discuss this further.

Best,

**LAINA R. BORIS, ESQ. | FREEHILL HOGAN & MAHAR LLP**

80 Pine Street, 25th Floor

New York, N.Y. 10005-1759

Main: 212-425-1900 | Fax: 212-425-1901

# EXHIBIT L





**Andrew N. Bazos, MD, FAAOS**

*Diplomate, American Board of Orthopedic Surgery*

May 21, 2023

Mr. Thomas J. Colameo  
Ahmuty, Demers & McManus  
Attorneys-at-Law  
199 Water Street, 16th Floor  
New York, NY 10038  
Email: [thomas.colameo@admlaw.com](mailto:thomas.colameo@admlaw.com)

<b>CLAIMANT:</b>	Karla R. Wong
<b>DATE OF LOSS:</b>	July 12, 2019
<b>FILE NUMBER:</b>	CHUO112N22TJC

### **INDEPENDENT MEDICAL RECORD REVIEW AND EXAMINATION**

Dear Attorney Colameo:

#### **PURPOSE:**

At your request, I performed an independent medical record review and examination (May 4, 2023) of the claimant, Karla R. Wong, and injuries she allegedly sustained in an accident, dated July 12, 2019.

**REVIEW OF MEDICAL RECORDS:** In forming my opinions, I relied upon the following medical records:

1. Verified Bill of Particulars dated May 3, 2022.
2. CT scans of the head and cervical spine and x-rays of the clavicle and right shoulder reports from Elmhurst Hospital Center dated July 12, 2019.
3. Medical records from Integrative Medical Services, P.C., dated July 31, 2019, through July 29, 2022.
4. MRI of the right shoulder report from Atlas Radiology, P.C., dated August 27, 2019.
5. MRI of the cervical spine report from Atlas Radiology dated September 5, 2019.
6. Medical records from Emmanuel Hostin, M.D., dated September 11, 2019.
7. Medical records from Eagle US Neurology, P.C., dated September 14, 2019.
8. Medical records from New York Pain Management Associates, Inc., dated September 26, 2019, through January 23, 2020.

RE: Karla R. Wong  
May 21, 2023  
Page 2

9. EMG of the cervical spine report from Eagle US Neurology, P.C., dated September 28, 2019.
10. Operative report regarding cervical facet block by Conrad F. Cean, M.D., dated December 18, 2019.
11. Medical records from Lan's Acupuncture, PLLC, dated January 20, 2020, through February 11, 2020.
12. Medical records from Paul K. Ratzker, M.D., dated November 19, 2020.
13. Deposition of Karla R. Wong dated January 30, 2023.

**HISTORY:**

[REDACTED]

[REDACTED]

[REDACTED]

RE: Karla R. Wong  
May 21, 2023  
Page 3

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RE: Karla R. Wong  
May 21, 2023  
Page 4

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**EXAMINATION:**

I performed an Independent Medical Examination on the claimant, Karla Wong, in my Manhattan office on May 4, 2023. The claimant presented photo identification at the time of the examination. Prior to entering the exam room today, the claimant's file/medical records were reviewed as part of the examination performed. The claimant is accompanied by Ms. Gonzalez, a legal representative.

RE: Karla R. Wong  
May 21, 2023  
Page 5

The claimant reports being a 53-year-old female that had a ceiling fall on her causing her to fall on July 12, 2019. [REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

At the time of the injury, the claimant was employed doing demolition. She has not worked since the injury.

*The claimant has been instructed to advise us of any pain during the examination.*

#### **EXAMINATION:**

*For the physical examination documented below, please rely upon the following approximate normal values I use as generally described in the AMA guidelines 6th Edition. Of note, these are simply "normals" in the general population and can vary by many degrees based on multiple factors including genetics or age. Approximate normal cervical range of motion is 60 degrees of flexion, 75 degrees of extension, 70 degrees of left rotation and 70 degrees of right rotation. Normal lumbar flexion is 90 degrees and extension is 30 degrees. Normal degrees of shoulder range of motion are 180 of forward elevation, 170 of abduction, 45 of external rotation and 60 of internal rotation. Normal ranges of elbow motion are 135 degrees of flexion and 0 degrees of extension, 80 degrees of pronation and 80 degrees of supination. Normal ranges of wrist motion are 60 of extension and 60 of flexion. Normal ranges of interphalangeal motion are 0 degrees extension and 80 degrees flexion; metacarpal-phalangeal motion normals are 0 degrees extension to 90 degrees of flexion. Normal hip motion includes 90 degrees of flexion and 10 degrees of extension and internal and external rotation of 30 degrees. Normal knee range of motion is 0 degrees of extension and 130 degrees of flexion. Normal ankle*

RE: Karla R. Wong  
May 21, 2023  
Page 6

*dorsiflexion is 10 degrees, and normal ankle plantar flexion is 20 degrees. Normal ankle inversion and eversion are 20 and 10 respectively.*

*All ranges-of-motion were determined by visual landmarks and a goniometer. Range-of-motion testing is noted to be subjective, at the voluntary control of the patient being tested.*

On physical examination, the claimant stands 5 feet 0 inches tall, weighs 105 pounds, demonstrates a normal gait.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RE: Karla R. Wong  
May 21, 2023  
Page 7

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**IMPRESSION:**

After careful review of the medical records made available to me in this case and my examination on May 4, 2023, [REDACTED]

[REDACTED]

RE: Karla R. Wong  
May 21, 2023  
Page 8

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



RE: Karla R. Wong  
May 21, 2023  
Page 9

**SUMMARY:**

Should you have any further questions, please do not hesitate to contact my office.

*The above-named claimant was examined at the request of a third party in accordance with the restrictive rules concerning an independent medical examination. The claimant has been informed that I am not his/her physician, nor should anything stated in the examination or my report be relied upon by the claimant or his/her counsel as a basis for further medical treatment. It is therefore understood that no doctor/patient relationship either exists or is implied by this examination and that I am not a party to this proceeding. I am the physician who subscribed to the above report, have read the same and know the contents thereof. The same is true to the best of my knowledge, except as to matters stated to be on information and belief, as to those matters I believe to be true.*

*Further, my exam was limited to the specific requests made by the third party and was not a general examination as to the general health and well-being of the claimant. The examination and this report are not intended, in any way, to cover any unrelated conditions of any kind that go beyond the scope of the request by the third party. I did not receive any financial payments that were linked to the outcome of this examination or review, as the payments are based solely on established fees and charges and/or to compensate me for my time. I have a scope of licensure and certification that typically manages the medical*

RE: Karla R. Wong  
May 21, 2023  
Page 10

*condition, procedure, and/or treatments under review. I possess a current and relevant knowledge upon which to base my review.*

*Sincerely,*

A handwritten signature in black ink, appearing to be 'AB' with a long horizontal stroke extending to the right.

Andrew Bazos, M.D.

rs-pb

# EXHIBIT M



**Andrew N. Bazos, MD, FAAOS**

*Diplomate, American Board of Orthopedic Surgery*

June 6, 2023

William G. MacDevitt, Esquire  
Farber, Brocks & Zane, LLP  
Attorneys-at-Law  
400 Garden City Plaza, Suite 100  
Garden City, NY 11530  
Email: [wmacdevitt@fbzlaw.com](mailto:wmacdevitt@fbzlaw.com)

**CLAIMANT:**

Enildo H. Disla

**DATE OF LOSS:**

September 25, 2018

**FILE NUMBER:**

12-11593

### **INDEPENDENT MEDICAL RECORD REVIEW AND EXAMINATION**

Dear Attorney MacDevitt:

#### **PURPOSE:**

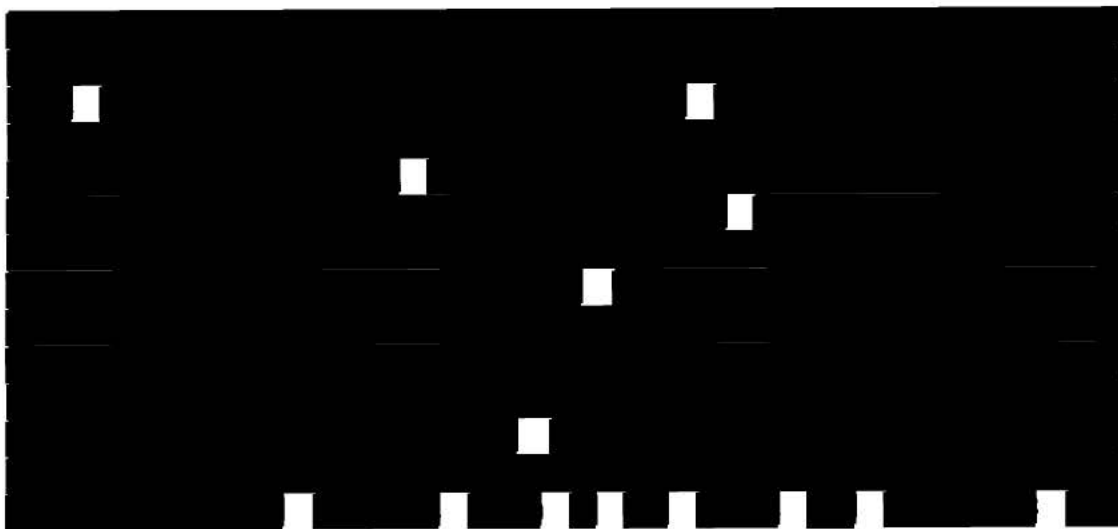
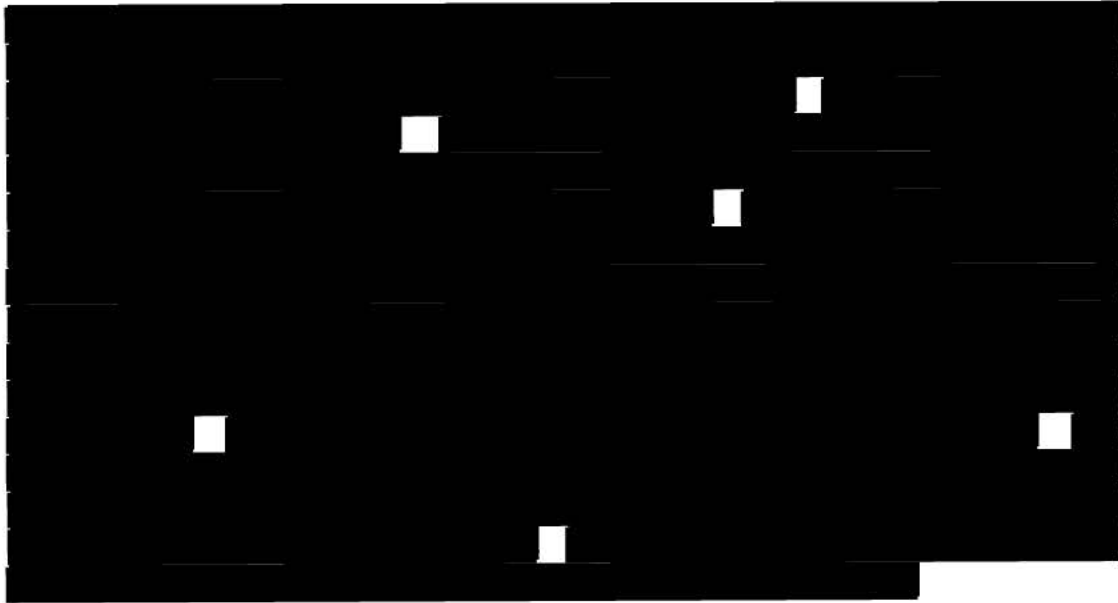
At your request, I performed an independent medical record review and examination (May 18, 2023) of the claimant, Enildo H. Disla, and injuries he allegedly sustained in an accident, dated September 25, 2018.

**REVIEW OF MEDICAL RECORDS:** In forming my opinions, I relied upon the following medical records:

1. Verified Bill of Particulars dated October 25, 2021.
2. Supplemental verified Bill of Particulars dated December 6, 2021.
3. Medical records from the Brooklyn Hospital Center dated September 25, 2018, through December 24, 2018.
4. Medical records from the Brooklyn Hospital Center dated January 29, 2013, through April 19, 2013.
5. Deposition of Enildo H. Disla dated August 15, 2022.
6. Three CDs from the Brooklyn Hospital Center containing x-rays of the right shoulder and right humerus.

#### **HISTORY:**

RE: Enildo H. Disla  
June 6, 2023  
Page 2



RE: Enildo H. Disla  
June 6, 2023  
Page 3

[REDACTED]

[REDACTED]

[REDACTED]

**EXAMINATION:**

I performed an Independent Medical Examination on the claimant, Enildo Disla, in my Manhattan office on May 18, 2023. The claimant presented photo identification at the time of the examination. Prior to entering the exam room today, the claimant's file/medical records were reviewed as part of the examination performed. The claimant was accompanied by a legal representative by the name of Ms. Medina, who also served as an interpreter.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RE: Enildo H. Disla  
June 6, 2023  
Page 4

[REDACTED]

[REDACTED]

**EXAMINATION:**

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

RE: Enildo H. Disla  
June 6, 2023  
Page 5

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



RE: Enildo H. Disla  
June 6, 2023  
Page 6

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**IMPRESSION:**

[REDACTED]

[REDACTED]

[REDACTED]

RE: Enildo H. Disla  
June 6, 2023  
Page 7

[REDACTED]

[REDACTED]

[REDACTED]

**SUMMARY:**

[REDACTED]

Should you have any further questions, please do not hesitate to contact my office.

***The above-named claimant was examined at the request of a third party in accordance with the restrictive rules concerning an independent medical examination. The claimant has been informed that I am not his/her physician, nor should anything stated in the examination or my report be relied upon by the claimant or his/her counsel as a basis for further medical treatment. It is therefore understood that no doctor/patient relationship either exists or is implied by this examination and that I am not a party to this proceeding. I am the physician who subscribed to the above report, have read the same and know the contents thereof. The same is true to the best of my knowledge, except as to matters stated to be on information and belief, as to those matters I believe to be true.***

***Further, my exam was limited to the specific requests made by the third party and was not a general examination as to the general health and***

RE: Enildo H. Disla  
June 6, 2023  
Page 8

***well-being of the claimant. The examination and this report are not intended, in any way, to cover any unrelated conditions of any kind that go beyond the scope of the request by the third party. I did not receive any financial payments that were linked to the outcome of this examination or review, as the payments are based solely on established fees and charges and/or to compensate me for my time. I have a scope of licensure and certification that typically manages the medical condition, procedure, and/or treatments under review. I possess a current and relevant knowledge upon which to base my review.***

*Sincerely,*

A handwritten signature in black ink, appearing to be 'AB' with a long horizontal stroke extending to the right.

Andrew Bazos, M.D.

rs-pb

# EXHIBIT N

## **Jeffrey Salkin, M.D.**

*The American Board of Orthopedic Surgery*

421 Ocean Parkway, Brooklyn NY 11218

Examination Date: May 19, 2023

Report Date: May 30, 2023

Law Offices of Wade, Clark, Mulcahy, LLP  
180 Maiden Lane, Ste. 901  
New York, NY 10038

Re: Arcenis Rosa-Mejia  
Claim #: 070099  
DOI: 7/22/2019  
Request Type: Liability IME

To Whom It May Concern:

As per your request, I performed an independent orthopedic examination on the above-claimant on 5/19/23 in my White Plains, New York office. The claimant presented valid photo identification which was witnessed and copied.

The claimant was accompanied by Lizbeth Medina from IME Legal Reps. The claimant refused to complete the intake forms as per attorney's advice.

My findings of the examination are as follows:

### **HISTORY:**

Mr. Rosa-Mejia was involved in an accident on 7/22/19. The claimant refused to provide any information regarding the details of the accident. The claimant verbally reported sustaining injuries to the neck, mid-back, lower back, right arm, and right knee. The claimant verbally reported that he was seen in a hospital emergency room. He did not provide any additional information regarding his emergency treatment.

### **PAST MEDICAL HISTORY:**

The claimant refused to provide any information regarding his past medical or surgical history. The claimant refused to provide information regarding any medications he may be using.

The claimant refused to provide information regarding if he has been involved in any prior motor vehicle or workers' compensation accidents or if he has sustained any prior injuries.

Examinee Name: Arcenis Rosa-Mejia  
Examination Date: May 19, 2023

**EMPLOYMENT HISTORY:**

The claimant verbally reported that he is working but not in construction. He did not provide any additional information regarding his employment history.

**TREATMENT HISTORY TO DATE:**

The claimant verbally reported that he was treated with physical therapy. He verbally reported that he has not had injections or surgery. He did not provide any information regarding his current treatment.

**MEDICAL RECORDS REVIEWED AT THE TIME OF THIS EXAMINATION:**

- Bill of Particulars dated 05/27/22. (*Index No.: 56905/2020*)
- Remote examination before trial report dated 12/06/22.

- 
- 
- 
- 

- 

- 

- 

- 

- 

- 

-

Examinee Name: Arcenis Rosa-Mejia  
Examination Date: May 19, 2023

- 
- 
- 

- 
- 
- 
- 
- 
- 

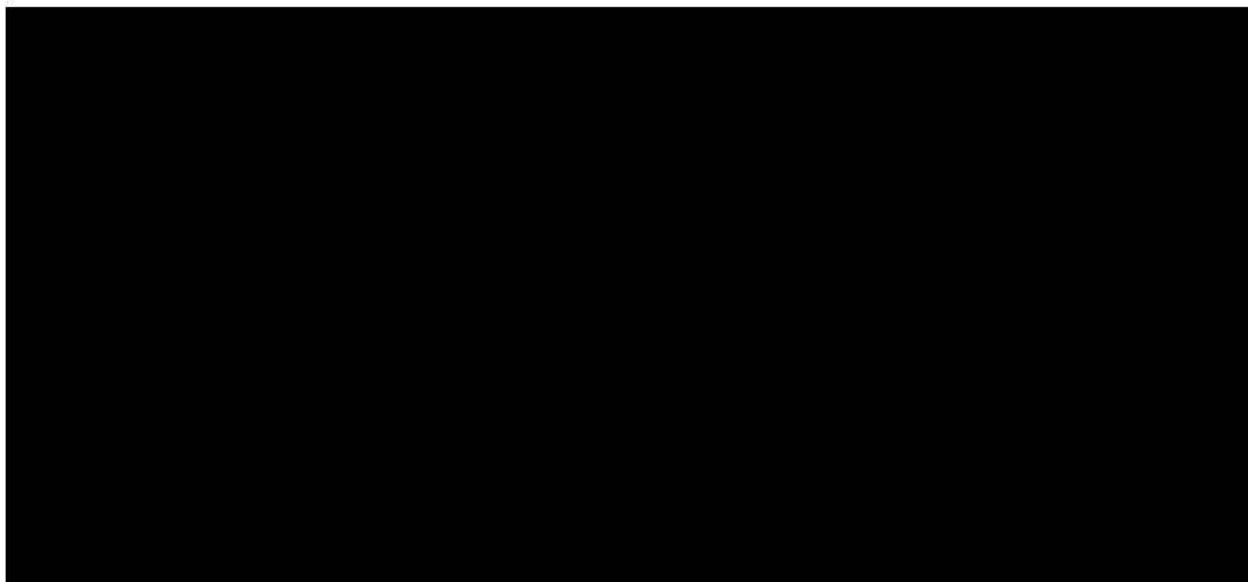
- 
- 
-



Examinee Name: Arcenis Rosa-Mejia

Examination Date: May 19, 2023

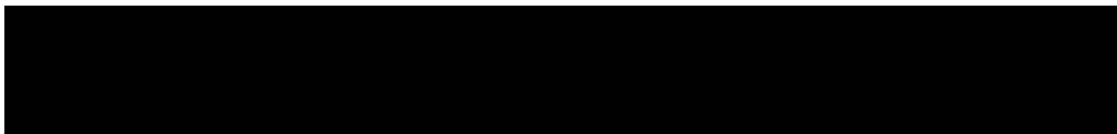
- 
- 
- 
- 



**ACTUAL IMAGING REVIEWED:**

I was also provided for review CD of actual imaging as follows:

- 
- 
- 



**PHYSICAL EXAMINATION:**

The claimant is a 32-year-old male who stands 5' 9" tall and weighs 180 lbs. He has brown eyes and black hair. The claimant stated being right-hand dominant.

The claimant verbally reported having lower back pain. He did not provide any additional information regarding his current complaints.

**GENERAL OBSERVATIONS:**

The claimant had a normal appearance and posture. No limp or antalgic gait was observed. The claimant did not need help getting dressed or getting on and off the exam table.

The claimant was examined with the examining room door left slightly ajar with the claimant's consent. He was asked to inform me as to any pain or tenderness during the examination. All ROM measurements were taken with the aid of a standard hand-held goniometer. ROM normal values are in accordance with both the NYS WC guidelines and AMA guidelines.

**EXAMINATION OF THE CERVICAL SPINE:** Examination of the cervical spine revealed no spasms. There was no paraspinal tenderness to palpation. There was minimal trapezii tenderness to palpation. Neurological examination of the upper extremities demonstrated muscle testing (5+/5) throughout. Sensory responses were intact throughout the upper extremities. Deep tendon reflexes of the biceps, triceps and brachioradialis were 1+ and



Examinee Name: Arcenis Rosa-Mejia

Examination Date: May 19, 2023

equal bilaterally. Atrophy of the intrinsic muscles was absent. Spurling's test was negative. Lhermitte's sign was negative.

#### **CERVICAL SPINE**

RANGE OF MOTION	NORMAL	CLAIMANT
FLEXION	50°	45°
EXTENSION	60°	50°
RIGHT ROTATION	80°	70°
LEFT ROTATION	80°	70°
RT. LATERAL FLEXION	45°	40°
LT. LATERAL FLEXION	45°	40°

**EXAMINATION OF THE THORACIC SPINE:** Examination of the thoracic spine revealed no paraspinal spasms and no paraspinal tenderness.

#### **THORACIC SPINE**

RANGE OF MOTION	NORMAL	CLAIMANT
FLEXION	45°	40°
EXTENSION	0°	0°
RT. ROTATION	30°	25°
LFT. ROTATION	30°	25°
RT. LATERAL BENDING	45°	40°
LFT. LATERAL BENDING	45°	40°

**EXAMINATION OF THE LUMBAR SPINE:** Examination of the lumbar spine revealed no paraspinal spasms. There was minimal paraspinal tenderness upon palpation. Neurological examination of the lower extremities demonstrated muscle testing to be (+5/5) throughout. Sensory responses were intact throughout the lower extremities. Patellar and Achilles reflexes were 1+ and equal bilaterally. Seated straight leg raising test was negative. Contralateral straight leg raising test was negative. Lasegue test was negative. The claimant was able to arise on heels and toes.

#### **LUMBAR SPINE**

RANGE OF MOTION	NORMAL	CLAIMANT
FLEXION	60°	50°
EXTENSION	25°	20°
RT LATERAL BENDING	25°	20°
LFT LATERAL BENDING	25°	20°

**EXAMINATION OF THE RIGHT KNEE:** Examination of the right knee revealed no tenderness to palpation. There was no effusion. There was no atrophy of the quadriceps. McMurray's test was negative. Lachman's test was negative. Anterior drawer sign was negative. Posterior drawer sign was negative.

#### **RIGHT KNEE**

Examinee Name: Arcenis Rosa-Mejia

Examination Date: May 19, 2023

RANGE OF MOTION	NORMAL	CLAIMANT
FLEXION	150°	130°
EXTENSION	0°	0°

**EXAMINATION OF THE LEFT KNEE:** Examination of the left knee revealed no tenderness to palpation. There was no effusion. There was no atrophy of the quadriceps. McMurray's test was negative. Lachman's test was negative. Anterior drawer sign was negative. Posterior drawer sign was negative.

**LEFT KNEE**

RANGE OF MOTION	NORMAL	CLAIMANT
FLEXION	150°	140°
EXTENSION	0°	0°

**HEAD:** I defer comment to the appropriate specialist.

**DIAGNOSES:** The claimant presents with diagnoses of:

1. Cervical spine sprain/contusion, resolved.
2. Thoracic spine sprain/contusion, resolved.
3. Lumbar spine sprain/contusion, resolved.
4. Right knee contusion, resolved.

**PROGNOSIS:** Good.

I, Jeffrey Salkin, being a Diplomate of the American Board of Orthopaedic Surgery, am duly licensed to practice medicine in the State of New York. I affirm, under the penalties of perjury, that the information contained within this document was prepared and is the work product of the undersigned, and is true to the best of my knowledge and information.

If any additional information is made available for my review, I will be happy to re-evaluate my position at that time.

With reasonable notice, I am available to testify, by appointment, should the need arise.

Sincerely,



Jeffrey Salkin, M.D.  
Orthopedic Surgeon  
Diplomate of The American Board  
of Orthopedic Surgery  
License # 168830-1

JS:jm

Examinee Name: Arcenis Rosa-Mejia  
Examination Date: May 19, 2023

It is understood that no doctor/patient relationship exists or is implied by this examination. This individual was examined with reference to the specific complaints emanating from the original injury. Any other medical conditions, which were either unreported or felt to be unrelated to the original injury are considered to be beyond the scope of this examination.

I, Jeffrey Salkin, M.D., hereby affirm pursuant to CPLR 2106 under the penalties of perjury that I am a physician, duly licensed to practice medicine in the State of New York and I am not a party to the action herein. I further affirm pursuant to CPLR 2106 and under the penalties of perjury that the statements made in this report are true and accurate.

# EXHIBIT O

---

**From:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>  
**Sent:** Tuesday, April 16, 2024 8:06:18 PM  
**To:** Jamie Felsen <[jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)>  
**Subject:** RE: IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. I Case No.: 1:22-cv-1032

You don't often get email from [boris@freehill.com](mailto:boris@freehill.com). [Learn why this is important](#)

Good evening,

There were three (3) different IMEs conducted in *Mauricio Aguilar Saldivar v. Fay Sen Lee and Jian Mei Laundromat, Inc.* I have included screenshots of the relevant portions of the IME reports below, as well as an attachment I was provided from Dr. Chernoff's office. The only information I have about the representatives that appeared with the Plaintiff at the IMEs is below and attached. I have never communicated with them. I am unable to send copies of the IME reports as that would violate the Plaintiff's HIPAA rights, unless you are able to provide a duly executed HIPAA authorization from Plaintiff.

2. October 10, 2023 IME conducted by Daniel J. Feuer, M.D.

The claimant is a forty-three-year-old right-handed male referred for neurological evaluation. He was accompanied to the office by an agent from his attorney's office named Christian. Christian was not present for any of the claimant's treatment evaluations. Christian is observed looking down writing notes throughout the course of the evaluation. The history was obtained directly from the claimant, as well as the medical record provided for review.

Best,

**LAINA R. BORIS, ESQ. | FREEHILL HOGAN & MAHAR LLP**

80 Pine Street, 25th Floor

New York, N.Y. 10005-1759

Main: 212-425-1900 | Fax: 212-425-1901

Direct: 212-381-3002 | Mobile: 929-260-2740

E-mail: [boris@freehill.com](mailto:boris@freehill.com)

---

**From:** Jamie Felsen <[jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)>

**Sent:** Tuesday, April 16, 2024 7:46 PM

**To:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>

**Subject:** Re: IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. | Case No.: 1:22-cv-1032



Laina,

The subpoena was meant for you and not plaintiff's counsel. We are looking for a copy of the IME report which typically identifies the observer and the company that employs the observer. You can send it to me by email.

---

**From:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>  
**Sent:** Tuesday, April 16, 2024 10:43:11 AM  
**To:** Jamie Felsen <[jamiefelsen@mlaborlaw.com](mailto:jamiefelsen@mlaborlaw.com)>; Jamie Felsen <[jamiefelsen@mlaborlaw.com](mailto:jamiefelsen@mlaborlaw.com)>  
**Subject:** IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. | Case No.: 1:22-cv-1032

You don't often get email from [boris@freehill.com](mailto:boris@freehill.com). [Learn why this is important](#)

Good morning,

Our office received the attached subpoena yesterday. I think it may have been improperly addressed to us as we do not represent the Plaintiff in *Mauricio Aguilar Saldivar v. Fay Sen Lee and Jian Mei Laundromat, Inc.*, Index No. 520616/2018. Rather, we represent the Defendants in that action. I can try to help the best I can, but as defense counsel, I am not usually provided any information about the representative that goes with the plaintiffs to the IMEs. I have included Plaintiff's counsel's information below.

GINARTE GALLARDO GONZALEZ WINOGRAD, LLP

Attn: Frank Pintauro, Esq.

The Woolworth Building

[233 Broadway – 24th Floor](#)

[New York, New York 10279](#)

T: (212) 601-9700

[fpintauro@ginartelaw.com](mailto:fpintauro@ginartelaw.com)

Please feel free to call me at 929-260-2740 if you would like to discuss this further.

Best,

**LAINA R. BORIS, ESQ. | FREEHILL HOGAN & MAHAR LLP**

80 Pine Street, 25th Floor

New York, N.Y. 10005-1759

Main: 212-425-1900 | Fax: 212-425-1901

**EXHIBIT P**



---

**From:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>  
**Sent:** Tuesday, April 16, 2024 8:06:18 PM  
**To:** Jamie Felsen <[jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)>  
**Subject:** RE: IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. | Case No.: 1:22-cv-1032

You don't often get email from [boris@freehill.com](mailto:boris@freehill.com). [Learn why this is important](#)

Good evening,

There were three (3) different IMEs conducted in *Mauricio Aguilar Saldivar v. Fay Sen Lee and Jian Mei Laundromat, Inc.* I have included screenshots of the relevant portions of the IME reports below, as well as an attachment I was provided from Dr. Chernoff's office. The only information I have about the representatives that appeared with the Plaintiff at the IMEs is below and attached. I have never communicated with them. I am unable to send copies of the IME reports as that would violate the Plaintiff's HIPAA rights, unless you are able to provide a duly executed HIPAA authorization from Plaintiff.

3. January 31, 2024 IME conducted by Ira Jay Chernoff, M.D.

Mauricio Aguilar Saldivar was seen in our Manhattan office on January 31, 2024 for the purpose of an orthopedic independent medical evaluation, in which he was seen for alleged spinal injuries secondary to a fall on August 15, 2017. The claimant's New York State Identification Card was obtained for picture identification. The claimant was seen with an interpreter from Elite Languages, Mr. Roberto Platzer, who was present throughout the exam and provided translation services. Mr. Platzer's business card was photocopied for picture identification. The claimant was also seen with a legal representative from IME Legal Reps, Mr. Christian Hogarth, who was present throughout the evaluation. Mr. Hogarth's New York State identification card was obtained for picture identification. Secondary to COVID-19 safety measures, temperatures were obtained from the claimant, Mr. Platzer, and Mr. Hogarth prior to entering the office today and were normal, and COVID-19 vaccination screening forms were additionally obtained. The claimant was advised by Mr. Hogarth not to fill out any of the intake paperwork in our office today.

Best,

**LAINA R. BORIS, ESQ. | FREEHILL HOGAN & MAHAR LLP**

80 Pine Street, 25th Floor

New York, N.Y. 10005-1759

Main: 212-425-1900 | Fax: 212-425-1901

Direct: 212-381-3002 | Mobile: 929-260-2740

E-mail: [boris@freehill.com](mailto:boris@freehill.com)

---

**From:** Jamie Felsen <[jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)>

**Sent:** Tuesday, April 16, 2024 7:46 PM

**To:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>

**Subject:** Re: IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. | Case No.: 1:22-cv-1032

Laina,

The subpoena was meant for you and not plaintiff's counsel. We are looking for a copy of the IME report which typically identifies the observer and the company that employs the observer. You can send it to me by email.

---

**From:** BORIS, LAINA <[BORIS@FREEHILL.COM](mailto:BORIS@FREEHILL.COM)>  
**Sent:** Tuesday, April 16, 2024 10:43:11 AM  
**To:** Jamie Felsen <[jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)>; Jamie Felsen <[jamiefelsen@mllaborlaw.com](mailto:jamiefelsen@mllaborlaw.com)>  
**Subject:** IME WatchDog, Inc. v. Safa Abdulrahim Gelardi, et al. | Case No.: 1:22-cv-1032

You don't often get email from [boris@freehill.com](mailto:boris@freehill.com). [Learn why this is important](#)

Good morning,

Our office received the attached subpoena yesterday. I think it may have been improperly addressed to us as we do not represent the Plaintiff in *Mauricio Aguilar Saldivar v. Fay Sen Lee and Jian Mei Laundromat, Inc.*, Index No. 520616/2018. Rather, we represent the Defendants in that action. I can try to help the best I can, but as defense counsel, I am not usually provided any information about the representative that goes with the plaintiffs to the IMEs. I have included Plaintiff's counsel's information below.

GINARTE GALLARDO GONZALEZ WINOGRAD, LLP

Attn: Frank Pintauro, Esq.

The Woolworth Building

[233 Broadway – 24th Floor](#)

[New York, New York 10279](#)

T: (212) 601-9700

[fpintauro@ginartelaw.com](mailto:fpintauro@ginartelaw.com)

Please feel free to call me at 929-260-2740 if you would like to discuss this further.

Best,

**LAINA R. BORIS, ESQ. | FREEHILL HOGAN & MAHAR LLP**

80 Pine Street, 25th Floor

New York, N.Y. 10005-1759

Main: 212-425-1900 | Fax: 212-425-1901